

CUSTOMS BULLETIN AND DECISIONS

***Weekly Compilation of
Decisions, Rulings, Regulations, Notices, and Abstracts
Concerning Customs and Related Matters of the
Bureau of Customs and Border Protection
U.S. Court of Appeals for the Federal Circuit
and
U.S. Court of International Trade***

VOL. 37

JULY 23, 2003

NO. 30

This issue contains:

Bureau of Customs and Border Protection

General Notices

U.S. Court of International Trade

Slip Op. 03-78

**DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION**

NOTICE

The decisions, rulings, regulations, notices and abstracts which are published in the CUSTOMS BULLETIN are subject to correction for typographical or other printing errors. Users may notify the Bureau of Customs and Border Protection, Office of Finance, Logistics Division, National Support Services Center, Washington, DC 20229, of any such errors in order that corrections may be made before the bound volumes are published.

**Please visit the U.S. Customs Web at:
<http://www.customs.gov>**

Bureau of Customs and Border Protection

General Notices

DISTRIBUTION OF CONTINUED DUMPING AND SUBSIDY OFFSET TO AFFECTED DOMESTIC PRODUCERS

AGENCY: Customs and Border Protection, Department of Homeland Security.

ACTION: Notice of intent to distribute offset for Fiscal Year 2003.

SUMMARY: Pursuant to the Continued Dumping and Subsidy Offset Act of 2000, this document is Customs and Border Protection's (CBP) notice of intention to distribute assessed antidumping or countervailing duties (known as the continued dumping and subsidy offset) for Fiscal Year 2003 in connection with antidumping duty orders or findings or countervailing duty orders. This document sets forth the list of individual antidumping duty orders or findings and countervailing duty orders, together with the affected domestic producers associated with each order or finding who are potentially eligible to receive a distribution. This document also provides the instructions for affected domestic producers to file written certifications to claim a distribution in relation to the listed orders or findings.

DATES: Written certifications to obtain a continued dumping and subsidy offset under a particular order or finding must be received by September 12, 2003.

ADDRESSES: Written certifications should be addressed to: Assistant Commissioner, Office of Regulations and Rulings, U.S. Bureau of Customs and Border Protection, 1300 Pennsylvania Avenue, NW., Washington, D.C. 20229 (ATTENTION: Ada Loo).

FOR FURTHER INFORMATION CONTACT:

Ada Loo, Office of Regulations and Rulings, (202-572-8869) or LaToya Burley, Office of Regulations and Rulings, (202-572-8793).

SUPPLEMENTARY INFORMATION:

BACKGROUND

The Continued Dumping and Subsidy Offset Act of 2000 (ACDSOA) was enacted on October 28, 2000, as part of the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2001 ("Act"). The provisions of the CDSOA are contained in Title X (sections 1001—1003) of the Act.

The CDSOA, in section 1003 of the Act, amended Title VII of the Tariff Act of 1930, by adding a new section 754 (codified at 19 U.S.C. 1675c) in order to provide that assessed duties received pursuant to a countervailing duty order, an antidumping duty order, or an antidumping duty finding under the Antidumping Act of 1921, must be distributed to affected domestic producers for certain qualifying expenditures that these producers incur after the issuance of such an order or finding. The term "affected domestic producer" means any manufacturer, producer, farmer, rancher or worker representative (including associations of such persons) that—

(A) Was a petitioner or interested party in support of a petition with respect to which an antidumping order, a finding under the Antidumping Act of 1921, or a countervailing duty order has been entered, and

(B) Remains in operation.

The distribution that these parties may receive is known as the continued dumping and subsidy offset.

List of Orders or Findings and Affected Domestic Producers

It is the responsibility of the U.S. International Trade Commission (USITC) to ascertain and timely forward to the Bureau of Customs and Border Protection (CBP) a list of the affected domestic producers that are potentially eligible to receive an offset in connection with an order or finding.

To this end, it is noted that the USITC has supplied CBP with the list of individual antidumping and countervailing duty cases, and the affected domestic producers associated with each case that are potentially eligible to receive an offset. This list appears at the end of this document.

CBP Regulations Implementing the CDSOA

It is noted that CBP published a final rule in the **Federal Register** (66 FR 48546) on September 21, 2001, as T.D. 01-68, which was effective as of that date, in order to implement the CDSOA. The final rule added a new subpart F to part 159 of the CBP Regulations (19 CFR part 159, subpart F (§§ 159.61—159.64)).

Notice of Intent to Distribute Offset

This document announces that CBP intends to distribute to affected domestic producers the assessed antidumping or countervailing duties that are available for distribution in Fiscal Year 2003 in connection with those antidumping duty orders or findings or countervailing duty orders that are listed in this document. Section 159.62(a), Customs Regulations (19 CFR 159.62(a)), provides that CBP will publish such a notice of intention to distribute assessed duties at least 90 days before the end of a fiscal year.

Certifications; Submission and Content

To obtain a distribution of the offset under a given order or finding, an affected domestic producer must submit a certification to CBP, in triplicate, indicating that the producer desires to receive a distribution.

As required by § 159.62(b), Customs Regulations (19 CFR 159.62(b)), this notice provides the case name and number of the order or finding concerned, as well as the specific instructions for filing a certification under § 159.63 to claim a distribution. However, although § 159.62(b) also provides that the dollar amounts subject to distribution that were contained in the Special Account for each listed order or finding as of July 1, 2003, would appear in this notice, because these dollar amounts were not available in time for inclusion in this publication, these preliminary amounts will instead be posted shortly on the CBP website (www.cbp.gov), for purposes of enabling affected domestic producers to determine whether it would be worthwhile to file a certification in a given case. The final amounts available for disbursement may differ from the preliminary amounts.

A successor to a company appearing on the list of affected domestic producers in this notice, or a member company of an association that appears on the list of affected domestic producers in this notice, where the member company does not appear on the list, should also consult § 159.61(b)(1)(i) or 159.61(b)(1)(ii), Customs Regulations, respectively (19 CFR 159.61(b)(1)(i) or 159.61(b)(1)(ii)), concerning whether and, if so, the additional procedures under which such party may file a certification to claim an offset.

Specifically, to obtain a distribution of the offset under a given order or finding, each affected domestic producer must timely submit a certification, in triplicate, to the Assistant Commissioner, Office of Regulations and Rulings, Headquarters, containing the required information detailed below as to the eligibility of the producer to receive the requested distribution and the total amount of the distribution that the producer is claiming. The certification must enumerate the qualifying expenditures incurred by the domestic producer since

the issuance of an order or finding and it must demonstrate that the domestic producer is eligible to receive a distribution as an affected domestic producer.

As provided in § 159.63(b), Customs Regulations (19 CFR 159.63(b)), certifications to obtain a distribution of an offset must be received by CBP no later than 60 days after the date of publication of the notice of intent in the **Federal Register**.

While there is no established format for a certification, the certification must contain the following information:

1. The date of this **Federal Register** notice;
2. The Commerce case number;
3. The case name (Product/country);
4. The name of the domestic producer and any name qualifier, if applicable (for example, any other name under which the domestic producer does business or is also known);
5. The address of the domestic producer (if a post office box, the secondary street address must also appear), including, if applicable, a specific room number or department;
6. The Internal Revenue Service (IRS) number (with suffix) of the domestic producer, employer identification number, or social security number, as applicable;
7. The specific business organization of the domestic producer (corporation, partnership, sole proprietorship);
8. The name(s) of any individual(s) designated by the domestic producer as the contact person(s) concerning the certification, together with the phone number(s) and/or facsimile transmission number(s) and electronic mail (email) address(es) for the person(s);
9. The total dollar amount claimed;
10. The dollar amount claimed by category, as described in the section below entitled "Amount Claimed for Distribution";
11. A statement of eligibility, as described in the section below entitled "Eligibility to Receive Distribution"; and
12. A signature by a corporate officer legally authorized to bind the producer.

Qualifying Expenditures which may be Claimed for Distribution

Qualifying expenditures which may be offset by a distribution of assessed antidumping and countervailing duties encompass those expenditures that are incurred after the issuance of an antidumping duty order or finding or a countervailing duty order, and prior to its termination, provided that such expenditures fall within any of the following categories: (1) Manufacturing facilities; (2) Equipment; (3) Research and development; (4) Personnel training; (5) Acquisition of technology; (6) Health care benefits for employees paid for by the employer; (7) Pension benefits for employees paid for by the employer; (8) Environmental equipment, training, or technology; (9) Ac-

quisition of raw materials and other inputs; and (10) Working capital or other funds needed to maintain production.

Amount Claimed for Distribution

In calculating the amount of the distribution being claimed as an offset, the certification must enumerate the following: (1) The total amount of any qualifying expenditures currently and previously certified by the domestic producer, and the amount certified by category; (2) The total amount of those expenditures which have been the subject of any prior distribution under 19 U.S.C. 1675c; and (3) The net amount for new and remaining qualifying expenditures being claimed in the current certification (the total amount currently and previously certified as noted in item "(1)" above minus the total amount that was the subject of any prior distribution as noted in item "(2)" above) (§ 159.63(b)(2)(i)—(b)(2)(iii), Customs Regulations (19 CFR 159.63(b)(2)(i)—(b)(2)(iii))). Total amounts disbursed by CBP under the CDSOA for Fiscal Year 2001 and 2002 are available on the CBP website.

Additionally, these qualifying expenditures must be related to the production of the same product that is the subject of the order or finding, with the exception of expenses incurred by associations which must relate to a specific case (§ 159.61(c), Customs Regulations (19 CFR 159.61(c))).

Eligibility to Receive Distribution

As noted, the certification must contain a statement that the domestic producer desires to receive a distribution and is eligible to receive the distribution as an affected domestic producer. Also, the domestic producer must affirm that the net amount certified for distribution does not encompass any qualifying for expenditures which distribution has previously been made (§ 159.63(b)(3)(i), Customs Regulations (19 CFR 159.63(b)(3)(i))).

Furthermore, where a party is listed as an affected domestic producer on more than one order or finding covering the same product and files a separate certification for each order or finding using the same qualifying expenditures as the basis for distribution in each case, each certification must list all the other orders or findings where the producer is claiming the same qualifying expenditures (§ 159.63(b)(3)(ii), Customs Regulations (19 CFR 159.63(b)(3)(ii))).

Moreover, as required by 19 U.S.C. 1675c(b)(1) and § 159.63(b)(3)(iii), Customs Regulations (19 CFR 159.63(b)(3)(iii)), the statement must include information as to whether the domestic producer remains in operation and continues to produce the product covered by the particular order or finding under which the distribution is sought. If a domestic producer is no longer in operation, or no

longer produces the product covered by the order or finding, the producer would not be considered an affected domestic producer entitled to receive a distribution.

In addition, as required by 19 U.S.C. 1675c(b)(5) and § 159.63(b)(3)(iii), the domestic producer must state whether it has been acquired by a company or business that is related to a company that opposed the antidumping or countervailing duty investigation that resulted in the order or finding under which the distribution is sought. If a domestic producer has been so acquired, the producer would again not be considered an affected domestic producer entitled to receive a distribution.

The certification must be executed and dated by a party legally authorized to bind the domestic producer and it must state that the information contained in the certification is true and accurate to the best of the certifier's knowledge and belief under penalty of law, and that the domestic producer has records to support the qualifying expenditures being claimed (see section below entitled "Verification of Certification").

Review and Correction of Certification

A certification that is submitted in response to this notice of distribution may be reviewed before acceptance to ensure that all informational requirements are complied with and that any amounts set forth in the certification for qualifying expenditures, including the amount claimed for distribution, appear to be correct. A certification that is found to be materially incorrect or incomplete will be returned to the domestic producer, as provided in § 159.63(c), Customs Regulations (19 CFR 159.63(c)). It is the sole responsibility of the domestic producer to ensure that the certification is correct, complete and satisfactory so as to demonstrate the entitlement of the domestic producer to the distribution requested. Failure to ensure that the certification is correct, complete and satisfactory will result in the domestic producer not receiving a distribution.

Verification of Certification

Certifications are subject to CBP's verification. Because of this, parties are required to maintain records supporting their claims for a period of three years after the filing of the certification (see § 159.63(d), Customs Regulations (19 CFR 159.63(d))). The records must be those that are normally kept in the ordinary course of business; these records must support each qualifying expenditure enumerated in the certification; and they must support how the qualifying expenditures are determined to be related to the production of the product covered by the order or finding.

Disclosure of Information in Certifications; Acceptance by Producer

The name of the affected domestic producer, the total dollar amount claimed by that party on the certification, as well as the total dollar amount that CBP actually disburses to that company as an offset, will be available for disclosure to the public, as specified in § 159.63(e), Customs Regulations (19 CFR 159.63(e)). To this extent, the submission of the certification is construed as an understanding and acceptance on the part of the domestic producer that this information will be disclosed to the public. Alternatively, a statement in a certification that this information is proprietary and exempt from disclosure will result in CBP's rejection of the certification.

List of Orders or Findings and Related Domestic Producers

The list of individual antidumping duty orders or findings and countervailing duty orders is set forth below, together with the affected domestic producers associated with each order or finding that are potentially eligible to receive an offset.

NOTE:

On April 8, 2003, the U.S. Court of International Trade (CIT) issued a decision concerning a successor company claim for a distribution under the Continued Dumping and Subsidy Offset Act of 2000 (CDSOA), 19 U.S.C. § 1675c. *Candle Corporation of America and Blyth, Inc. v. United States*, No. 02-00751 Slip Op. 03-40 (Ct. Int'l Trade Apr. 8, 2003), *appeal docketed*, No. 03-1348 (Fed. Cir. April 28, 2003). The CIT found that the Candle Corporation of America (CCA) response to a 1986 ITC questionnaire "clearly indicates that CCA did not support the petition." Slip Op at 13. The CIT reasoned that, although 19 CFR 159.61(b)(1)(i) permits a "successor company" to file a certification to claim an offset on behalf of its predecessor, the "eligibility for certification under the regulation is subject to the limitations imposed by 19 U.S.C. § 1675c, which requires that a claimant (1) have [petitioned] or supported the petition, and (2) remain in operation." Consequently, the CIT held that it was not arbitrary, capricious, an abuse of discretion or otherwise contrary to law for Customs (which is now CBP) to deny CCA's claim.

An appeal to the Federal Circuit has been filed. A final decision may affect future distributions. Assuming an appeal remains pending, CBP may evaluate whether interim adjustments to future distributions would be prudent. CBP will notify the public of any such adjustments through a future Federal Register notice.

DATED: July 7, 2003

LARRY L. BURTON,
Acting Assistant Commissioner,
Office of Regulations and Rulings.

[Published in the Federal Register, July 14, 2003 (68 FR 41597)].

Attachment

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-588-028	AA1921-111	Roller chain/Japan	American Chain Association Acme Chain Division, North American Rockwell Atlas Chain & Precision Products Diamond Chain Link-Belt Chain Division, FMC Morse Chain Division, Borg Warner Rex Chainbelt
A-401-040	AA1921-114	Stainless steel plate/ Sweden	Jessop Steel
A-588-041	AA1921-115	Synthetic methionine/ Japan	Monsanto
A-588-046	AA1921-129	Polychloroprene rubber/Japan	E.I. du Pont de Nemours
A-122-047	AA1921-127	Elemental sulphur/ Canada	Duval
A-588-056	AA1921-162	Melamine/Japan	Melamine Chemical
A-475-059	AA1921-167	Pressure-sensitive plastic tape/Italy	Minnesota Mining & Manufacturing
A-588-068	AA1921-188	Prestressed concrete steel wire strand/ Japan	American Spring Wire Armco Steel Bethlehem Steel CF&I Steel Florida Wire & Cable
C408-046	104-TAA-7	Sugar/EU	No petition at the Commis- sion; Commerce service list iden- tifies: U.S. Beet Sugar Association Florida Sugar Marketing and Terminal Associa- tion American Sugar Cane League American Sugarbeet Growers Association Florida Sugar Cane League Rio Grande Valley Sugar Growers Association Michigan Sugar Amstar Sugar Sugar Cane Growers Cooperative of Florida Alexander & Baldwin Michigan Farm Bureau

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			H&R Brokerage Talisman Sugar American Farm Bureau Federation Leach Farms A.J. Yates Hawaiian Agricultural Research Center United States Beet Sugar Association United States Cane Sugar Refiners' Association
A-423-077	AA1921-198	Sugar/Belgium	Florida Sugar Marketing and Terminal Association
A-427-078	AA1921-199	Sugar/France	Florida Sugar Marketing and Terminal Association
A-428-082	AA1921-200	Sugar/Germany	Florida Sugar Marketing and Terminal Association
A-122-085	731-TA-3	Sugar and syrups/ Canada	Amstar Sugar
A-427-098	731-TA-25	Anhydrous sodium metasilicate/ France	PQ
A-427-001	731-TA-44	Sorbitol/France	Lonza Pfizer
A-570-007	731-TA-149	Barium chloride/ China	Chemical Products
A-570-101	731-TA-101	Greige polyester cotton printcloth/ China	Alice Manufacturing Clinton Mills Dan River Greenwood Mills Hamrick Mills M. Lowenstein Mayfair Mills Mount Vernon Mills
C-357-004	701-TA-A	Carbon steel wire rod/ Argentina	Atlantic Steel Continental Steel Georgetown Steel North Star Steel Raritan River Steel
A-357-007	731-TA-157	Carbon steel wire rod/ Argentina	Atlantic Steel Continental Steel Georgetown Steel North Star Steel Raritan River Steel
A-469-007	731-TA-126	Potassium permanganate/ Spain	Carus Chemical
A-570-001	731-TA-125	Potassium permanganate/ China	Carus Chemical
A-570-002	731-TA-130	Chloropicrin/China	LCP Chemicals & Plastics Niklor Chemical

Commerce case number	Commission case number	Product/country	Petitioners/supporters
C-533-063	303-TA-13	Iron metal castings/ India	Campbell Foundry Le Baron Foundry Municipal Castings Neenah Foundry Pinkerton Foundry U.S. Foundry & Manufacturing Vulcan Foundry
A-122-503	731-TA-263	Iron construction castings/Canada	Alhambra Foundry Allegheny Foundry Bingham & Taylor Campbell Foundry Charlotte Pipe & Foundry Deeter Foundry East Jordan Foundry Le Baron Foundry Municipal Castings Neenah Foundry Opelika Foundry Pinkerton Foundry Tyler Pipe U.S. Foundry & Manufacturing Vulcan Foundry
A-351-503	731-TA-262	Iron construction castings/Brazil	Alhambra Foundry Allegheny Foundry Bingham & Taylor Campbell Foundry Charlotte Pipe & Foundry Deeter Foundry East Jordan Foundry Le Baron Foundry Municipal Castings Neenah Foundry Opelika Foundry Pinkerton Foundry Tyler Pipe U.S. Foundry & Manufacturing Vulcan Foundry
A-570-502	731-TA-265	Iron construction castings/China	Alhambra Foundry Allegheny Foundry Bingham & Taylor Campbell Foundry Charlotte Pipe & Foundry Deeter Foundry East Jordan Foundry Le Baron Foundry Municipal Castings Neenah Foundry Opelika Foundry Pinkerton Foundry Tyler Pipe U.S. Foundry & Manufacturing Vulcan Foundry

Commerce case number	Commission case number	Product/country	Petitioners/supporters
C-351-504	701-TA-249	Heavy iron construction castings/ Brazil	Alhambra Foundry Allegheny Foundry Bingham & Taylor Campbell Foundry Charlotte Pipe & Foundry Deeter Foundry East Jordan Foundry Le Baron Foundry Municipal Castings Neenah Foundry Opelika Foundry Pinkerton Foundry Tyler Pipe U.S. Foundry & Manufacturing Vulcan Foundry
A-351-605	731-TA-326	Frozen concentrated orange juice/ Brazil	Alcoma Packing B&W Canning Berry Citrus Products Caulkins Indiantown Citrus Citrus Belle Citrus World Florida Citrus Mutual
A-570-825	731-TA-653	Sebacic acid/China	Union Camp
C-122-404	701-TA-224	Live swine/Canada	National Pork Producers Council Wilson Foods
A-357-405	731-TA-208	Barbed wire and barbed wire strand/ Argentina	CF&I Steel Davis Walker Forbes Steel & Wire Oklahoma Steel Wire
A-570-501	731-TA-244	Natural bristle paint brushes/China	Baltimore Brush Best Liebro Elder & Jenks EZ Paint H&G Industries Joseph Lieberman & Sons Purdy Rubberset Thomas Paint Applicators Wooster Brush
A-570-003	731-TA-103	Cotton shop towels/ China	Milliken Texel Industries Wikit
C-535-001	701-TA-202	Cotton shop towels/ Pakistan	Milliken
C-333-401	701-TA-E	Cotton shop towels/ Peru	No case at the Commission; Commerce service list identifies: Durafab Kleen-Tex Industries Pavis & Harcourt Lewis Eckert Robb Milliken
A-538-802	731-TA-514	Cotton shop towels/ Bangladesh	Milliken

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-570-504	731-TA-282	Petroleum wax candles/China	The A.I. Root Company Candle Artisans, Inc. Candle-Lite Cathedral Candle Colonial Candle of Cape Cod General Wax & Candle Lenox Candles Lumi-Lite Candle Meuch-Kreuzer Candle National Candle Association Will & Baumer WNS
A-588-045	AA1921-124	Steel wire rope/Japan	AMSTED Industries
A-201-806	731-TA-547	Carbon steel wire rope/Mexico	Bridon American Macwhyte Paulsen Wire Rope The Rochester Corporation Williamsport Wire-rope Works Wire Rope Corporation of America United Automobile, Aerospace and Agricul- tural Implement Workers (Local 960)
A-580-811	731-TA-546	Carbon steel wire rope/Korea	Bridon American Macwhyte Paulsen Wire Rope The Rochester Corporation Williamsport Wire-rope Works Wire Rope Corporation of America United Automobile, Aerospace and Agricul- tural Implement Workers (Local 960)
A-351-505	731-TA-278	Malleable cast iron pipe fittings/ Brazil	Stanley G. Flagg Grinnell Stockham Valves & Fittings U-Brand Ward Manufacturing
A-580-507	731-TA-279	Malleable cast iron pipe fittings/ Korea	Stanley G. Flagg Grinnell Stockham Valves & Fittings U-Brand Ward Manufacturing
A-583-507	731-TA-280	Malleable cast iron pipe fittings/ Tai- wan	Stanley G. Flagg Grinnell Stockham Valves & Fittings U-Brand Ward Manufacturing

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-588-605	731-TA-347	Malleable cast iron pipe fittings/ Japan	Stanley G. Flagg Grinnell Stockham Valves & Fittings U-Brand Ward Manufacturing
A-549-601	731-TA-348	Malleable cast iron pipe fittings/ Thailand	Stanley G. Flagg Grinnell Stockham Valves & Fittings U-Brand Ward Manufacturing
A-570-506	731-TA-298	Porcelain-on-steel cooking ware/ China	General Housewares
A-201-504	731-TA-297	Porcelain-on-steel cooking ware/ Mexico	General Housewares
A-583-508	731-TA-299	Porcelain-on-steel cooking ware/ Taiwan	General Housewares
C-201-505	701-TA-265	Porcelain-on-steel cooking ware/ Mexico	General Housewares
A-580-601	731-TA-304	Top-of-the-stove stainless steel cooking ware/Korea	Farberware Regal Ware Revere Copper & Brass WearEver/Proctor Silex
C-580-602	701-TA-267	Top-of-the-stove stainless steel cooking ware/Korea	Farberware Regal Ware Revere Copper & Brass WearEver/Proctor Silex
A-583-603	731-TA-305	Top-of-the-stove stainless steel cooking ware/Taiwan	Farberware Regal Ware Revere Copper & Brass WearEver/Proctor Silex
C-583-604	701-TA-268	Top-of-the-stove stainless steel cooking ware/Taiwan	Farberware Regal Ware Revere Copper & Brass WearEver/Proctor Silex
C-351-604	701-TA-269	Brass sheet and strip/ Brazil	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-351-603	731-TA-311	Brass sheet and strip/ Brazil	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-122-601	731-TA-312	Brass sheet and strip/ Canada	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-580-603	731-TA-315	Brass sheet and strip/ Korea	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-427-602	731-TA-313	Brass sheet and strip/ France	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America
C-427-603	701-TA-270	Brass sheet and strip/ France	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-428-602	731-TA-317	Brass sheet and strip/ Germany	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-475-601	731-TA-314	Brass sheet and strip/ Italy	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-401-601	731-TA-316	Brass sheet and strip/ Sweden	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company Olin Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-588-704	731-TA-379	Brass sheet and strip/ Japan	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company North Coast Brass & Copper Olin Pegg Metals Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-421-701	731-TA-380	Brass sheet and strip/ Netherlands	American Brass Bridgeport Brass Chase Brass & Copper Hussey Copper The Miller Company North Coast Brass & Copper Olin Pegg Metals Revere Copper Products Allied Industrial Workers of America International Association of Machinists & Aerospace Workers

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Mechanics Educational Society of America (Local 56) United Steelworkers of America
A-831-801	731-TA-340-A	Solid urea/Armenia	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
A-822-801	731-TA-340-B	Solid urea/Belarus	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
A-447-801	731-TA-340-C	Solid urea/Estonia	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
A-451-801	731-TA-340-D	Solid urea/Lithuania	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
A-485-601	731-TA-339	Solid urea/Romania	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
A-821-801	731-TA-340-E	Solid urea/Russia	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
A-842-801	731-TA-340-F	Solid urea/Tajikistan	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-843-801	731-TA-340-G	Solid urea/ Turkmenistan	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
A-823-801	731-TA-340-H	Solid urea/Ukraine	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
A-844-801	731-TA-340-I	Solid urea/Uzbekistan	Agrico Chemical American Cyanamid CF Industries First Mississippi Mississippi Chemical Terra International W.R. Grace
C-508-605	701-TA-286	Industrial phosphoric acid/Israel	Albright & Wilson FMC Hydrite Chemical Monsanto Stauffer Chemical
A-423-602	731-TA-365	Industrial phosphoric acid/Belgium	Albright & Wilson FMC Hydrite Chemical Monsanto Stauffer Chemical
A-489-602	731-TA-364	Aspirin/Turkey	Dow Chemical Monsanto Norwich-Eaton
A-122-605	731-TA-367	Color picture tubes/ Canada	Philips Electronic Components Group Zenith Electronics Industrial Union Department, AFL-CIO International Association of Machinists & Aerospace Workers International Brotherhood of Electrical Workers International Union of Electronic, Electrical, Technical, Salaried and Machine Workers United Steelworkers of America
A-588-609	731-TA-368	Color picture tubes/ Japan	Philips Electronic Components Group Zenith Electronics Industrial Union Department, AFL-CIO

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			International Association of Machinists & Aerospace Workers International Brotherhood of Electrical Workers International Union of Electronic, Electrical, Technical, Salaried and Machine Workers United Steelworkers of America
A-580-605	731-TA-369	Color picture tubes/ Korea	Philips Electronic Components Group Zenith Electronics Industrial Union Department, AFL-CIO International Association of Machinists & Aerospace Workers International Brotherhood of Electrical Workers International Union of Electronic, Electrical, Technical, Salaried and Machine Workers United Steelworkers of America
A-559-601	731-TA-370	Color picture tubes/ Singapore	Philips Electronic Components Group Zenith Electronics Industrial Union Department, AFL-CIO International Association of Machinists & Aerospace Workers International Brotherhood of Electrical Workers International Union of Electronic, Electrical, Technical, Salaried and Machine Workers United Steelworkers of America
A-588-054	AA1921-143	Tapered roller bearings 4 inches and under/Japan	No companies identified as petitioners at the Commission; Commerce service list identifies: Mitsubishi Nissan Motor Yamaha Motors NSK Hoover-NSK Bearing ITOCHU International Toyota Motor Sales Timken Nippon Seiko Kawasaki Heavy Duty Industries

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Komatsu America Nachi Western Ford Motor Federal Mogul Itocho Kanematsu-Goshu USA Nissan Motor USA Nachi America Motorambar Honda General Motors Sumitomo Koyo Seiko American Honda Motor Subaru of America Suzuki Motor Kubota Tractor Isuzu Nachi-Fujikoshi NTN
A-570-601	731-TA-344	Tapered roller bearings/China	L&S Bearing Timken Torrington
A-437-601	731-TA-341	Tapered roller bearings/Hungary	L&S Bearing Timken Torrington
A-485-602	731-TA-345	Tapered roller bearings/Romania	L&S Bearing Timken Torrington
A-588-604	731-TA-343	Tapered roller bearings over 4 inches/Japan	L&S Bearing Timken Torrington
A-427-801	731-TA-392-A	Ball bearings/France	Kubar Bearings McGill Manufacturing Co. MPB Torrington
A-427-801	731-TA-392-B	Cylindrical roller bearings/France	MPB Torrington
A-427-801	731-TA-392-C	Spherical plain bearings/France	McGill Manufacturing Co. Torrington
A-428-801	731-TA-391-A	Ball bearings/Germany	Kubar Bearings McGill Manufacturing Co. MPB Torrington
A-428-801	731-TA-391-B	Cylindrical roller bearings/Germany	MPB Torrington
A-428-801	731-TA-391-C	Spherical plain bearings/Germany	Torrington
A-475-801	731-TA-393-A	Ball bearings/Italy	Kubar Bearings McGill Manufacturing Co. MPB Torrington
A-475-801	731-TA-393-B	Cylindrical roller bearings/Italy	MPB Torrington

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-588-804	731-TA-394-A	Ball bearings/Japan	Kubar Bearings McGill Manufacturing Co. MPB Torrington
A-588-804	731-TA-394-B	Cylindrical roller bearings/Japan	MPB Torrington
A-588-804	731-TA-394-C	Spherical plain bearings/Japan	Torrington
A-485-801	731-TA-395	Ball bearings/Romania	Kubar Bearings MPB Torrington
A-559-801	731-TA-396	Ball bearings/Singapore	Kubar Bearings McGill Manufacturing Co. MPB Torrington
A-401-801	731-TA-397-A	Ball bearings/Sweden	Kubar Bearings MPB Torrington
A-401-801	731-TA-397-B	Cylindrical roller bearings/Sweden	MPB Torrington
A-412-801	731-TA-399-A	Ball Bearings/United Kingdom	Kubar Bearings McGill Manufacturing Co. MPB Torrington
A-412-801	731-TA-399-B	Cylindrical roller bearings/United Kingdom	MPB Torrington
A-588-703	731-TA-377	Internal combustion industrial forklift trucks/Japan	Hyster Ad-Hoc Group of Workers from Hyster's Berea, Kentucky and Sulligent, Alabama Facilities Allied Industrial Workers of America Independent Lift Truck Builders Union International Association of Machinists & Aerospace Workers United Shop & Service Employees
A-588-706	731-TA-384	Nitrile rubber/Japan	Uniroyal Chemical
A-583-008	731-TA-132	Small diameter carbon steel pipe and tube/Taiwan	Allied Tube & Conduit American Tube Bull Moose Tube Copperweld Tubing J&L Steel Kaiser Steel Merchant Metals Pittsburgh Tube Southwestern Pipe Western Tube & Conduit

Commerce case number	Commission case number	Product/country	Petitioners/supporters
C-489-502	701-TA-253	Welded carbon steel pipe and tube/ Turkey	Allied Tube & Conduit American Tube Bernard Epps Bock Industries Bull Moose Tube Central Steel Tube Century Tube Copperweld Tubing Cyclops Hughes Steel & Tube Kaiser Steel Laclede Steel Maruichi American Maverick Tube Merchant Metals Phoenix Steel Pittsburgh Tube Quanex Sharon Tube Southwestern Pipe UNR-Leavitt Welded Tube Western Tube & Conduit Wheatland Tube
A-549-502	731-TA-252	Welded carbon steel pipe and tube/ Thailand	Allied Tube & Conduit American Tube Bernard Epps Bock Industries Bull Moose Tube Central Steel Tube Century Tube Copperweld Tubing Cyclops Hughes Steel & Tube Kaiser Steel Laclede Steel Maruichi American Maverick Tube Merchant Metals Phoenix Steel Pittsburgh Tube Quanex Sharon Tube Southwestern Pipe UNR-Leavitt Welded Tube Western Tube & Conduit Wheatland Tube
A-533-502	731-TA-271	Welded carbon steel pipe and tube/ India	Allied Tube & Conduit American Tube Bernard Epps Bock Industries Bull Moose Tube Central Steel Tube Century Tube Copperweld Tubing Cyclops Hughes Steel & Tube

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Kaiser Steel Laclede Steel Maruichi American Maverick Tube Merchant Metals Phoenix Steel Pittsburgh Tube Quanex Sharon Tube Southwestern Pipe UNR-Leavitt Welded Tube Western Tube & Conduit Wheatland Tube
A-489-501	731-TA-273	Welded carbon steel pipe and tube/ Turkey	Allied Tube & Conduit American Tube Bernard Epps Bock Industries Bull Moose Tube Central Steel Tube Century Tube Copperweld Tubing Cyclops Hughes Steel & Tube Kaiser Steel Laclede Steel Maruichi American Maverick Tube Merchant Metals Phoenix Steel Pittsburgh Tube Quanex Sharon Tube Southwestern Pipe UNR-Leavitt Welded Tube Western Tube & Conduit Wheatland Tube
A-122-506	731-TA-276	Oil country tubular goods/Canada	CF&I Steel Copperweld Tubing Cyclops KPC Lone Star Steel LTV Steel Maverick Tube Quanex U.S. Steel
A-583-505	731-TA-277	Oil country tubular goods/Taiwan	CF&I Steel Copperweld Tubing Cyclops KPC Lone Star Steel LTV Steel Maverick Tube Quanex U.S. Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-559-502	731-TA-296	Small diameter standard and rectangular pipe and tube/ Singapore	Allied Tube & Conduit American Tube Bull Moose Tube Cyclops Hannibal Industries Laclede Steel Pittsburgh Tube Sharon Tube Western Tube & Conduit Wheatland Tube
A-583-803	731-TA-410	Light-walled rectangular tube/ Taiwan	Bull Moose Tube Hannibal Industries Harris Tube Maruichi American Searing Industries Southwestern Pipe Western Tube & Conduit
A-357-802	731-TA-409	Light-walled rectangular tube/ Argentina	Bull Moose Tube Hannibal Industries Harris Tube Maruichi American Searing Industries Southwestern Pipe Western Tube & Conduit
A-351-809	731-TA-532	Circular welded nonalloy steel pipe/ Brazil	Allied Tube & Conduit American Tube Bull Moose Tube Century Tube CSI Tubular Products Cyclops Laclede Steel LTV Tubular Products Maruichi American Sharon Tube Western Tube & Conduit Wheatland Tube
A-580-809	731-TA-533	Circular welded nonalloy steel pipe/ Korea	Allied Tube & Conduit American Tube Bull Moose Tube Century Tube CSI Tubular Products Cyclops Laclede Steel LTV Tubular Products Maruichi American Sharon Tube Western Tube & Conduit Wheatland Tube
A-201-805	731-TA-534	Circular welded nonalloy steel pipe/ Mexico	Allied Tube & Conduit American Tube Bull Moose Tube Century Tube CSI Tubular Products Cyclops Laclede Steel LTV Tubular Products

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Maruichi American Sharon Tube Western Tube & Conduit Wheatland Tube
A-583-814	731-TA-536	Circular welded nonalloy steel pipe/ Taiwan	Allied Tube & Conduit American Tube Bull Moose Tube Century Tube CSI Tubular Products Cyclops Laclede Steel LTV Tubular Products Maruichi American Sharon Tube Western Tube & Conduit Wheatland Tube
A-307-805	731-TA-537	Circular welded nonalloy steel pipe/ Venezuela	Allied Tube & Conduit American Tube Bull Moose Tube Century Tube CSI Tubular Products Cyclops Laclede Steel LTV Tubular Products Maruichi American Sharon Tube Western Tube & Conduit Wheatland Tube
A-588-707	731-TA-386	Granular polytetrafluoroethylene/ Ja- pan	E.I. du Pont de Nemours ICI Americas
A-475-703	731-TA-385	Granular polytetrafluoroethylene/ Italy	E.I. du Pont de Nemours ICI Americas
A-351-602	731-TA-308	Carbon steel butt-weld pipe fittings/ Brazil	Ladish Mills Iron Works Steel Forgings Tube Forgings of America Weldbend
A-583-605	731-TA-310	Carbon steel butt-weld pipe fittings/ Taiwan	Ladish Mills Iron Works Steel Forgings Tube Forgings of America Weldbend
A-588-602	731-TA-309	Carbon steel butt-weld pipe fittings/ Japan	Ladish Mills Iron Works Steel Forgings Tube Forgings of America Weldbend
A-570-814	731-TA-520	Carbon steel butt-weld pipe fittings/ China	Hackney Ladish Mills Iron Works Steel Forgings Tube Forgings of America

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-549-807	731-TA-521	Carbon steel butt-weld pipe fittings/ Thailand	Hackney Ladish Mills Iron Works Steel Forgings Tube Forgings of America
A-484-801	731-TA-406	Electrolytic manganese dioxide/ Greece	Chemetals Kerr-McGee Rayovac
A-588-806	731-TA-408	Electrolytic manganese dioxide/ Japan	Chemetals Kerr-McGee Rayovac
A-428-802	731-TA-419	Industrial belts/ Germany	The Gates Rubber Company The Goodyear Tire and Rubber Company
A-475-802	731-TA-413	Industrial belts/Italy	The Gates Rubber Company The Goodyear Tire and Rubber Company
A-588-807	731-TA-414	Industrial belts/Japan	The Gates Rubber Company The Goodyear Tire and Rubber Company
A-559-802	731-TA-415	Industrial belts/ Singapore	The Gates Rubber Company The Goodyear Tire and Rubber Company
A-427-009	731-TA-96	Industrial nitrocellulose/ France	Hercules
A-351-804	731-TA-439	Industrial nitrocellulose/Brazil	Hercules
A-570-802	731-TA-441	Industrial nitrocellulose/China	Hercules
A-428-803	731-TA-444	Industrial nitrocellulose/ Germany	Hercules
A-588-812	731-TA-440	Industrial nitrocellulose/Japan	Hercules
A-580-805	731-TA-442	Industrial nitrocellulose/Korea	Hercules
A-412-803	731-TA-443	Industrial nitrocellulose/ United Kingdom	Hercules
A-479-801	731-TA-445	Industrial nitrocellulose/ Yugoslavia	Hercules
A-122-804	731-TA-422	Steel rails/Canada	Bethlehem Steel CF&I Steel
C-122-805	701-TA-297	Steel rails/Canada	Bethlehem Steel CF&I Steel
A-588-811	731-TA-432	Drafting machines/ Japan	Vemco

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-588-810	731-TA-429	Mechanical transfer presses/Japan	Allied Products United Autoworkers of America United Steelworkers of America
A-570-803	731-TA-457-A	Axes and adzes/China	Warwood Tool Woodings-Verona
A-570-803	731-TA-457-B	Bars and wedges/China	Warwood Tool Woodings-Verona
A-570-803	731-TA-457-C	Hammers and sledges/China	Warwood Tool Woodings-Verona
A-570-803	731-TA-457-D	Picks and mattocks/China	Warwood Tool Woodings-Verona
A-570-805	731-TA-466	Sodium thiosulfate/China	Calabrian
A-428-807	731-TA-465	Sodium thiosulfate/Germany	Calabrian
A-412-805	731-TA-468	Sodium thiosulfate/United Kingdom	Calabrian
C-469-004	701-TA-178	Stainless steel wire rod/Spain	AL Tech Specialty Steel Armco Steel Carpenter Technology Colt Industries Cyclops Guterl Special Steel Joslyn Stainless Steels Republic Steel
A-533-808	731-TA-638	Stainless steel wire rod/India	AL Tech Specialty Steel Armco Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-351-819	731-TA-636	Stainless steel wire rod/Brazil	AL Tech Specialty Steel Armco Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-427-811	731-TA-637	Stainless steel wire rod/France	AL Tech Specialty Steel Armco Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-580-810	731-TA-540	Welded ASTM A-312 stainless steel pipe/Korea	Avesta Sandvik Tube Bristol Metals Crucible Materials Damascus Tubular Products United Steelworkers of America

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-583-815	731-TA-541	Welded ASTM A-312 stainless steel pipe/ Taiwan	Avesta Sandvik Tube Bristol Metals Crucible Materials Damascus Tubular Products United Steelworkers of America
A-403-801	731-TA-454	Fresh and chilled Atlantic salmon/ Norway	Heritage Salmon The Coalition for Fair Atlantic Salmon Trade
C-403-802	701-TA-302	Fresh and chilled Atlantic salmon/ Norway	Heritage Salmon The Coalition for Fair Atlantic Salmon Trade
A-580-807	731-TA-459	Polyethylene terephthalate film/ Korea	E.I. du Pont de Nemours Hoechst Celanese ICI Americas
A-570-804	731-TA-464	Sparklers/China	B.J. Alan Diamond Sparkler Elkton Sparkler
A-588-702	731-TA-376	Stainless steel butt-weld pipe fittings/ Japan	Flowline Shaw Alloy Piping Products Taylor Forge Stainless
A-580-813	731-TA-563	Stainless steel butt-weld pipe fittings/ Korea	Gerlin Markovitz Enterprises Shaw Alloy Piping Products Taylor Forge Stainless
A-583-816	731-TA-564	Stainless steel butt-weld pipe fittings/ Taiwan	Gerlin Markovitz Enterprises Shaw Alloy Piping Products Taylor Forge Stainless
A-201-802	731-TA-451	Gray portland cement and clinker/ Mexico	Alamo Cement Blue Circle BoxCrow Cement Calaveras Cement Capitol Aggregates Centex Cement Florida Crushed Stone Gifford-Hill Hanson Permanente Cement Ideal Basic Industries National Cement Company of Alabama National Cement Company of California Phoenix Cement Riverside Cement Southdown Tarmac America Texas Industries Independent Workers of North America (Locals 49, 52, 89, 192, and 471) International Union of Operating Engineers (Local 12)

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-588-815	731-TA-461	Gray portland cement and clinker/ Japan	Calaveras Cement Hanson Permanente Cement National Cement Company of California Southdown Independent Workers of North America (Locals 49, 52, 89, 192, and 471) International Union of Operating Engineers (Local 12)
A-307-803	731-TA-519	Gray portland cement and clinker/ Venezuela	Florida Crushed Stone Southdown Tarmac America
C-307-804	303-TA-21	Gray portland cement and clinker/ Venezuela	Florida Crushed Stone Southdown Tarmac America
A-588-817	731-TA-469	Electroluminescent flat-panel displays/ Japan	The Cherry Corporation Electro Plasma Magnascreen OIS Optical Imaging Systems Photonics Technology Planar Systems Plasmaco
A-570-808	731-TA-474	Chrome-plated lug nuts/China	Consolidated International Automotive Key Manufacturing McGard
A-583-810	731-TA-475	Chrome-plated lug nuts/Taiwan	Consolidated International Automotive Key Manufacturing McGard
A-122-814	731-TA-528	Pure magnesium/ Canada	Magnesium Corporation of America
C-122-815	701-TA-309-A	Alloy magnesium/ Canada	Magnesium Corporation of America
C-122-815	701-TA-309-B	Pure magnesium/ Canada	Magnesium Corporation of America
A-557-805	731-TA-527	Extruded rubber thread/Malaysia	Globe Manufacturing North American Rubber Thread
A-843-802	731-TA-539	Uranium/Kazakhstan	Ferret Exploration First Holding Geomex Minerals IMC Fertilizer Malapai Resources Pathfinder Mines Power Resources Rio Algom Mining Solution Mining

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Total Minerals Umetco Minerals Uranium Resources Oil, Chemical and Atomic Workers
A-821-802	731-TA-539-C	Uranium/Russia	Ferret Exploration First Holding Geomex Minerals IMC Fertilizer Malapai Resources Pathfinder Mines Power Resources Rio Algom Mining Solution Mining Total Minerals Umetco Minerals Uranium Resources Oil, Chemical and Atomic Workers
A-844-802	731-TA-539-F	Uranium/Uzbekistan	Ferret Exploration First Holding Geomex Minerals IMC Fertilizer Malapai Resources Pathfinder Mines Power Resources Rio Algom Mining Solution Mining Total Minerals Umetco Minerals Uranium Resources Oil, Chemical and Atomic Workers
A-823-802	731-TA-539-E	Uranium/Ukraine	Ferret Exploration First Holding Geomex Minerals IMC Fertilizer Malapai Resources Pathfinder Mines Power Resources Rio Algom Mining Solution Mining Total Minerals Umetco Minerals Uranium Resources Oil, Chemical and Atomic Workers
A-583-080	AA1921-197	Carbon steel plate/ Taiwan	No petition (self-initiated by Treasury); Commerce service list identifies: U.S. Steel China Steel Bethlehem Steel
C-423-806	701-TA-319	Cut-to-length carbon steel plate/ Belgium	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
C-351-818	701-TA-320	Cut-to-length carbon steel plate/ Brazil	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
C-428-817	701-TA-322	Cut-to-length carbon steel plate/ Germany	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
C-201-810	701-TA-325	Cut-to-length carbon steel plate/ Mexico	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
C-469-804	701-TA-326	Cut-to-length carbon steel plate/ Spain	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
C-401-804	701-TA-327	Cut-to-length carbon steel plate/ Sweden	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
C-412-815	701-TA-328	Cut-to-length carbon steel plate/ United Kingdom	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-423-805	731-TA-573	Cut-to-length carbon steel plate/ Belgium	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-351-817	731-TA-574	Cut-to-length carbon steel plate/ Brazil	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-122-823	731-TA-575	Cut-to-length carbon steel plate/ Canada	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-405-802	731-TA-576	Cut-to-length carbon steel plate/ Finland	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-428-816	731-TA-578	Cut-to-length carbon steel plate/ Germany	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-201-809	731-TA-582	Cut-to-length carbon steel plate/ Mexico	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-455-802	731-TA-583	Cut-to-length carbon steel plate/ Poland	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-485-803	731-TA-584	Cut-to-length carbon steel plate/ Romania	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-469-803	731-TA-585	Cut-to-length carbon steel plate/ Spain	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-401-805	731-TA-586	Cut-to-length carbon steel plate/ Sweden	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
A-412-814	731-TA-587	Cut-to-length carbon steel plate/ United Kingdom	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel United Steelworkers of America
C-401-401	701-TA-231	Cold-rolled carbon steel flat products/ Sweden	Bethlehem Steel Chaparral U.S. Steel
C-428-817	701-TA-340	Cold-rolled carbon steel flat products/ Germany	Armco Steel Bethlehem Steel California Steel Industries Gulf States Steel Inland Steel Industries LTV Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
C-580-818	701-TA-342	Cold-rolled carbon steel flat products/ Korea	Armco Steel Bethlehem Steel California Steel Industries Gulf States Steel Inland Steel Industries LTV Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-428-814	731-TA-604	Cold-rolled carbon steel flat products/ Germany	Armco Steel Bethlehem Steel California Steel Industries Gulf States Steel Inland Steel Industries LTV Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
A-580-815	731-TA-607	Cold-rolled carbon steel flat products/ Korea	Armco Steel Bethlehem Steel California Steel Industries Gulf States Steel Inland Steel Industries LTV Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
A-421-804	731-TA-608	Cold-rolled carbon steel flat products/ Netherlands	Armco Steel Bethlehem Steel California Steel Industries Gulf States Steel Inland Steel Industries LTV Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
C-427-810	701-TA-348	Corrosion-resistant carbon steel flat products/France	Armco Steel Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries LTV Steel Lukens Steel National Steel Nextech

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
C-428-817	701-TA-349	Corrosion-resistant carbon steel flat products/Germany	Armco Steel Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries LTV Steel Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
C-580-818	701-TA-350	Corrosion-resistant carbon steel flat products/Korea	Armco Steel Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries LTV Steel Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
A-602-803	731-TA-612	Corrosion-resistant carbon steel flat products/Australia	Armco Steel Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries LTV Steel Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
A-122-822	731-TA-614	Corrosion-resistant carbon steel flat products/Canada	Armco Steel Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries LTV Steel Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
A-427-808	731-TA-615	Corrosion-resistant carbon steel flat products/France	Armco Steel Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries LTV Steel Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
A-428-815	731-TA-616	Corrosion-resistant carbon steel flat products/Germany	Armco Steel Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries LTV Steel Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-588-826	731-TA-617	Corrosion-resistant carbon steel flat products/Japan	Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Lukens Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
A-580-816	731-TA-618	Corrosion-resistant carbon steel flat products/Korea	Armco Steel Bethlehem Steel California Steel Industries Geneva Steel Gulf States Steel Inland Steel Industries LTV Steel Lukens Steel National Steel Nextech Sharon Steel Theis Precision Steel Thompson Steel U.S. Steel WCI Steel Weirton Steel United Steelworkers of America
A-570-815	731-TA-538	Sulfanilic acid/China	R-M Industries
A-533-806	731-TA-561	Sulfanilic acid/India	R-M Industries
C-533-807	701-TA-318	Sulfanilic acid/India	R-M Industries
A-570-806	731-TA-472	Silicon metal/China	American Alloys Elkem Metals Globe Metallurgical Silicon Metaltech SiMETCO SKW Alloys International Union of Electronics, Electrical, Machine and Furniture Workers (Local 693) Oil, Chemical and Atomic Workers (Local 389) Textile Processors, Service Trades, Health Care Professional and Technical Employees (Local 60) United Steelworkers of America (Locals 5171, 8538, and 12646)
A-351-806	731-TA-471	Silicon metal/Brazil	American Alloys Globe Metallurgical Silicon Metaltech SiMETCO

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			International Union of Electronics, Electrical, Machine and Furniture Workers (Local 693) Oil, Chemical and Atomic Workers (Local 389) Textile Processors, Service Trades, Health Care Professional and Technical Employees (Local 60) United Steelworkers of America (Locals 5171, 8538, and 12646)
A-357-804	731-TA-470	Silicon metal/ Argentina	American Alloys Elkem Metals Globe Metallurgical Silicon Metaltech SiMETCO SKW Alloys International Union of Electronics, Electrical, Machine and Furniture Workers (Local 693) Oil, Chemical and Atomic Workers (Local 389) Textile Processors, Service Trades, Health Care Professional and Technical Employees (Local 60) United Steelworkers of America (Locals 5171, 8538, and 12646)
A-570-819	731-TA-567	Ferrosilicon/China	AIMCOR Alabama Silicon American Alloys Globe Metallurgical Silicon Metaltech Oil, Chemical and Atomic Workers (Local 389) United Autoworkers of America (Local 523) United Steelworkers of America (Locals 2528, 3081, 5171, and 12646)
A-843-804	731-TA-566	Ferrosilicon/ Kazakhstan	AIMCOR Alabama Silicon American Alloys Globe Metallurgical Silicon Metaltech Oil, Chemical and Atomic Workers (Local 389) United Autoworkers of America (Local 523) United Steelworkers of America (Locals 2528, 3081, 5171, and 12646)

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-823-804	731-TA-569	Ferrosilicon/Ukraine	AIMCOR Alabama Silicon American Alloys Globe Metallurgical Silicon Metaltech Oil, Chemical and Atomic Workers (Local 389) United Autoworkers of America (Local 523) United Steelworkers of America (Locals 2528, 3081, 5171, and 12646)
C-307-808	303-TA-23	Ferrosilicon/Venezuela	AIMCOR Alabama Silicon American Alloys Globe Metallurgical Silicon Metaltech Oil, Chemical and Atomic Workers (Local 389) United Autoworkers of America (Local 523) United Steelworkers of America (Locals 2528, 3081, 5171, and 12646)
A-821-804	731-TA-568	Ferrosilicon/Russia	AIMCOR Alabama Silicon American Alloys Globe Metallurgical Silicon Metaltech Oil, Chemical and Atomic Workers (Local 389) United Autoworkers of America (Local 523) United Steelworkers of America (Locals 2528, 3081, 5171, and 12646)
A-307-807	731-TA-570	Ferrosilicon/Venezuela	AIMCOR Alabama Silicon American Alloys Globe Metallurgical Silicon Metaltech Oil, Chemical and Atomic Workers (Local 389) United Autoworkers of America (Local 523) United Steelworkers of America (Locals 2528, 3081, 5171, and 12646)
A-351-820	731-TA-641	Ferrosilicon/Brazil	AIMCOR Alabama Silicon American Alloys Globe Metallurgical Silicon Metaltech Oil, Chemical and Atomic Workers (Local 389)

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			United Autoworkers of America (Local 523) United Steelworkers of America (Locals 2528, 3081, 5171, and 12646)
A-823-805	731-TA-673	Silicomanganese/ Ukraine	Elkem Metals Oil, Chemical and Atomic Workers (Local 3-639)
A-351-824	731-TA-671	Silicomanganese/ Brazil	Elkem Metals Oil, Chemical and Atomic Workers (Local 3-639)
A-570-828	731-TA-672	Silicomanganese/ China	Elkem Metals Oil, Chemical and Atomic Workers (Local 3-639)
A-583-820	731-TA-625	Helical spring lock washers/Taiwan	Illinois Tool Works
A-570-822	731-TA-624	Helical spring lock washers/China	Illinois Tool Works
A-533-809	731-TA-639	Forged stainless steel flanges/India	Gerlin Ideal Forging Maass Flange Markovitz Enterprises
A-583-821	731-TA-640	Forged stainless steel flanges/ Taiwan	Gerlin Ideal Forging Maass Flange Markovitz Enterprises
A-421-805	731-TA-652	Aramid fiber/ Netherlands	E.I. du Pont de Nemours
C-475-812	701-TA-355	Grain-oriented silicon electrical steel/Italy	Allegheny Ludlum Armco Steel Butler Armco Independent Union United Steelworkers of America Zanesville Armco Independent Union
A-588-831	731-TA-660	Grain-oriented silicon electrical steel/ Japan	Allegheny Ludlum Armco Steel United Steelworkers of America
A-475-811	731-TA-659	Grain-oriented silicon electrical steel/Italy	Allegheny Ludlum Armco Steel Butler Armco Independent Union United Steelworkers of America Zanesville Armco Independent Union
A-570-831	731-TA-683	Fresh garlic/China	A&D Christopher Ranch Belridge Packing Colusa Produce Denice & Filice Packing El Camino Packing The Garlic Company Vessey and Company

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-570-826	731-TA-663	Paper clips/China	ACCO USA Labelon/Noesting TRICO Manufacturing
A-570-827	731-TA-669	Cased pencils/China	Blackfeet Indian Writing Instrument Dixon-Ticonderoga Empire Berol Faber-Castell General Pencil J.R. Moon Pencil Musgrave Pen & Pencil Panda Writing Instrument Manufacturers Association, Pencil Section
A-570-830	731-TA-677	Coumarin/China	Rhone-Poulenc
A-351-825	731-TA-678	Stainless steel bar/ Brazil	AL Tech Specialty Steel Carpenter Technology Crucible Specialty Metals Electralloy Republic Engineered Steels Slater Steels Talley Metals Technology United Steelworkers of America
A-533-810	731-TA-679	Stainless steel bar/ India	AL Tech Specialty Steel Carpenter Technology Crucible Specialty Metals Electralloy Republic Engineered Steels Slater Steels Talley Metals Technology United Steelworkers of America
A-588-833	731-TA-681	Stainless steel bar/ Japan	AL Tech Specialty Steel Carpenter Technology Crucible Specialty Metals Electralloy Republic Engineered Steels Slater Steels Talley Metals Technology United Steelworkers of America
A-469-805	731-TA-682	Stainless steel bar/ Spain	AL Tech Specialty Steel Carpenter Technology Crucible Specialty Metals Electralloy Republic Engineered Steels Slater Steels Talley Metals Technology United Steelworkers of America
A-570-836	731-TA-718	Glycine/China	Chattem Hampshire Chemical

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-570-832	731-TA-696	Pure magnesium/ China	Dow Chemical Magnesium Corporation of America International Union of Op- erating Engineers (Local 564) United Steelworkers of America (Local 8319)
A-570-835	731-TA-703	Furfuryl alcohol/ China	QO Chemicals
A-549-812	731-TA-705	Furfuryl alcohol/ Thailand	QO Chemicals
A-821-807	731-TA-702	Ferrovandium and nitrided vanadium/ Russia	Shieldalloy Metallurgical
A-549-813	731-TA-706	Canned pineapple/ Thailand	Maui Pineapple International Longshore- man's and Warehouse- man's Union
A-357-809	731-TA-707	Seamless pipe/ Argentina	Koppel Steel Quanex Timken United States Steel
A-351-826	731-TA-708	Seamless pipe/Brazil	Koppel Steel Quanex Timken United States Steel
A-428-820	731-TA-709	Seamless pipe/ Germany	Koppel Steel Quanex Timken United States Steel
A-475-814	731-TA-710	Seamless pipe/Italy	Koppel Steel Quanex Timken United States Steel
C-475-815	701-TA-362	Seamless pipe/Italy	Koppel Steel Quanex Timken United States Steel
C-475-817	701-TA-364	Oil country tubular goods/Italy	IPSCO Koppel Steel Lone Star Steel Maverick Tube Newport Steel North Star Steel U.S. Steel USS/Kobe
A-357-810	731-TA-711	Oil country tubular goods/Argentina	IPSCO Koppel Steel Lone Star Steel Maverick Tube Newport Steel North Star Steel U.S. Steel USS/Kobe

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-475-816	731-TA-713	Oil country tubular goods/Italy	Bellville Tube IPSCO Koppel Steel Lone Star Steel Maverick Tube Newport Steel North Star Steel U.S. Steel USS/Kobe
A-588-835	731-TA-714	Oil country tubular goods/Japan	IPSCO Koppel Steel Maverick Tube Newport Steel North Star Steel U.S. Steel
A-580-825	731-TA-715	Oil country tubular goods/Korea	Bellville Tube IPSCO Koppel Steel Lone Star Steel Maverick Tube Newport Steel North Star Steel U.S. Steel USS/Kobe
A-201-817	731-TA-716	Oil country tubular goods/Mexico	IPSCO Koppel Steel Maverick Tube Newport Steel North Star Steel U.S. Steel USS/Kobe
A-570-840	731-TA-724	Manganese metal/China	Elkem Metals Kerr-McGee
A-570-842	731-TA-726	Polyvinyl alcohol/China	Air Products and Chemicals
A-588-836	731-TA-727	Polyvinyl alcohol/Japan	Air Products and Chemicals
A-583-824	731-TA-729	Polyvinyl alcohol/Taiwan	Air Products and Chemicals
A-588-838	731-TA-739	Clad steel plate/Japan	Lukens Steel
C-475-819	701-TA-365	Pasta/Italy	A. Zerega's Sons American Italian Pasta Borden D. Merlino & Sons Dakota Growers Pasta Foulds Gilster-Mary Lee Gooch Foods Hershey Foods Pasta USA Philadelphia Macaroni S.T. Specialty Foods
C-489-806	701-TA-366	Pasta/Turkey	A. Zerega's Sons American Italian Pasta Borden D. Merlino & Sons

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Dakota Growers Pasta Foulds Gilster-Mary Lee Gooch Foods Hershey Foods Pasta USA Philadelphia Macaroni S.T. Specialty Foods
A-475-818	731-TA-734	Pasta/Italy	A. Zerega's Sons American Italian Pasta Borden D. Merlino & Sons Dakota Growers Pasta Foulds Gilster-Mary Lee Gooch Foods Hershey Foods Pasta USA Philadelphia Macaroni S.T. Specialty Foods
A-489-805	731-TA-735	Pasta/Turkey	A. Zerega's Sons American Italian Pasta Borden D. Merlino & Sons Dakota Growers Pasta Foulds Gilster-Mary Lee Gooch Foods Hershey Foods Pasta USA Philadelphia Macaroni S.T. Specialty Foods
A-428-821	731-TA-736	Large newspaper printing presses/ Germany	Rockwell Graphics Systems
A-588-837	731-TA-737	Large newspaper printing presses/ Japan	Rockwell Graphics Systems
A-201-820	731-TA-747	Fresh tomatoes/ Mexico	Accomack County Farm Bureau Ad Hoc Group of Florida, California, Georgia, Pennsylvania, South Carolina, Tennessee, and Virginia Tomato Grow- ers Florida Farm Bureau Fed- eration Florida Fruit and Vegetable Association Florida Tomato Exchange Florida Tomato Growers Exchange Gadsden County Tomato Growers Association South Carolina Tomato As- sociation
A-588-839	731-TA-740	Sodium azide/Japan	American Azide

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-570-844	731-TA-741	Melamine institutional dinnerware/ China	Carlisle Food Service Products Lexington United Plastics Manufacturing
A-560-801	731-TA-742	Melamine institutional dinnerware/ Indonesia	Carlisle Food Service Products Lexington United Plastics Manufacturing
A-583-825	731-TA-743	Melamine institutional dinnerware/ Taiwan	Carlisle Food Service Products Lexington United Plastics Manufacturing
A-570-846	731-TA-744	Brake rotors/China	Brake Parts Coalition for the Preservation of American Brake Drum and Rotor Aftermarket Manufacturers Kelsey Hayes Kinetic Parts Manufacturing Iroquois Tool Systems Overseas Auto Parts Wagner Brake
A-489-807	731-TA-745	Steel concrete reinforcing bar/ Turkey	AmeriSteel Auburn Steel Birmingham Steel Commercial Metals Marion Steel New Jersey Steel
A-588-840	731-TA-748	Gas turbo-compressor systems/ Japan	Demag Delaval Dresser-Rand United Steelworkers of America
A-570-847	731-TA-749	Persulfates/China	FMC
A-570-848	731-TA-752	Crawfish tail meat/ China	A&S Crawfish Acadiana Fisherman's Co-op Arnaudville Seafood Atchafalaya Crawfish Processors Basin Crawfish Processors Bayou Land Seafood Becnel's Meat & Seafood Bellard's Poultry & Crawfish Bonanza Crawfish Farm Cajun Seafood Distributors Carl's Seafood Catahoula Crawfish Choplin SFD C.J.'s Seafood & Purged Crawfish Clearwater Crawfish Harvey's Seafood Louisiana Premium Seafoods Louisiana Seafood

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Lawtell Crawfish Processors Phillips Seafood Prairie Cajun Wholesale Seafood Dist. Riceland Crawfish Seafood International Distributors Sylvester's Processors Teche Valley Seafood L.T. West Crawfish Processors Alliance
A-588-841	731-TA-750	Vector supercomputers/ Japan	Cray Research
A-570-849	731-TA-753	Cut-to-length carbon steel plate/ China	Bethlehem Steel Geneva Steel Gulf States Steel National Steel U.S. Steel United Steelworkers of America
A-821-808	731-TA-754	Cut-to-length carbon steel plate/ Russia	Bethlehem Steel Geneva Steel Gulf States Steel National Steel U.S. Steel United Steelworkers of America
A-791-804	731-TA-755	Cut-to-length carbon steel plate/ South Africa	Bethlehem Steel Geneva Steel Gulf States Steel National Steel U.S. Steel United Steelworkers of America
A-823-808	731-TA-756	Cut-to-length carbon steel plate/ Ukraine	Bethlehem Steel Geneva Steel Gulf States Steel National Steel U.S. Steel United Steelworkers of America
A-570-850	731-TA-757	Collated roofing nails/ China	Illinois Tool Works International Staple and Machines Stanley-Bostitch
A-583-826	731-TA-759	Collated roofing nails/ Taiwan	Illinois Tool Works International Staple and Machines Stanley-Bostitch
A-583-827	731-TA-762	SRAMs/Taiwan	Micron Technology

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-337-803	731-TA-768	Fresh Atlantic salmon/Chile	Atlantic Salmon of Maine Cooke Aquaculture US DE Salmon
			Global Aqua USA Island Aquaculture Maine Coast Nordic Scan Am Fish Farms Treats Island Fisheries Trumpet Island Salmon Farm
C-475-821	701-TA-373	Stainless steel wire rod/Italy	AL Tech Specialty Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-475-820	731-TA-770	Stainless steel wire rod/Italy	AL Tech Specialty Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-588-843	731-TA-771	Stainless steel wire rod/Japan	AL Tech Specialty Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-580-829	731-TA-772	Stainless steel wire rod/Korea	AL Tech Specialty Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-469-807	731-TA-773	Stainless steel wire rod/Spain	AL Tech Specialty Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-401-806	731-TA-774	Stainless steel wire rod/Sweden	AL Tech Specialty Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-583-828	731-TA-775	Stainless steel wire rod/Taiwan	AL Tech Specialty Steel Carpenter Technology Republic Engineered Steels Talley Metals Technology United Steelworkers of America
A-337-804	731-TA-776	Preserved mushrooms/Chile	L.K. Bowman Modern Mushroom Farms Monterey Mushrooms Mount Laurel Canning

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Mushroom Canning Southwood Farms Sunny Dell Foods United Canning
A-570-851	731-TA-777	Preserved mushrooms/China	L.K. Bowman Modern Mushroom Farms Monterey Mushrooms Mount Laurel Canning Mushroom Canning Southwood Farms Sunny Dell Foods United Canning
A-533-813	731-TA-778	Preserved mushrooms/India	L.K. Bowman Modern Mushroom Farms Monterey Mushrooms Mount Laurel Canning Mushroom Canning Southwood Farms Sunny Dell Foods United Canning
A-560-802	731-TA-779	Preserved mushrooms/ Indonesia	L.K. Bowman Modern Mushroom Farms Monterey Mushrooms Mount Laurel Canning Mushroom Canning Southwood Farms Sunny Dell Foods United Canning
C-423-809	701-TA-376	Stainless steel plate in coils/Belgium	Allegheny Ludlum Armco Steel Lukens Steel North American Stainless United Steelworkers of America
C-475-823	701-TA-377	Stainless steel plate in coils/Italy	Allegheny Ludlum Armco Steel J&L Specialty Steel Lukens Steel North American Stainless United Steelworkers of America
C-791-806	701-TA-379	Stainless steel plate in coils/South Africa	Allegheny Ludlum Armco Steel J&L Specialty Steel Lukens Steel North American Stainless United Steelworkers of America
A-423-808	731-TA-788	Stainless steel plate in coils/Belgium	Allegheny Ludlum Armco Steel Lukens Steel North American Stainless United Steelworkers of America
A-122-830	731-TA-789	Stainless steel plate in coils/Canada	Allegheny Ludlum Armco Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			J&L Specialty Steel Lukens Steel North American Stainless
A-475-822	731-TA-790	Stainless steel plate in coils/Italy	Allegheny Ludlum Armco Steel J&L Specialty Steel Lukens Steel North American Stainless United Steelworkers of America
A-580-831	731-TA-791	Stainless steel plate in coils/Korea	Allegheny Ludlum Armco Steel J&L Specialty Steel Lukens Steel North American Stainless United Steelworkers of America
A-791-805	731-TA-792	Stainless steel plate in coils/South Africa	Allegheny Ludlum Armco Steel J&L Specialty Steel Lukens Steel North American Stainless United Steelworkers of America
A-583-830	731-TA-793	Stainless steel plate in coils/Taiwan	Allegheny Ludlum Armco Steel J&L Specialty Steel Lukens Steel North American Stainless United Steelworkers of America
A-560-803	731-TA-787	Extruded rubber thread/Indonesia	North American Rubber Thread
A-588-846	731-TA-807	Hot-rolled carbon steel flat products/Japan	Bethlehem Steel California Steel Industries Gallatin Steel Geneva Steel Gulf States Steel IPSCO Ispat/Inland LTV Steel Nucor Steel Dynamics U.S. Steel WCI Weirton Steel Independent Steelworkers United Steelworkers of America
C-351-829	701-TA-384	Hot-rolled carbon steel flat products/Brazil	Bethlehem Steel California Steel Industries Gallatin Steel Geneva Steel Gulf States Steel IPSCO Ispat/Inland LTV Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			National Steel Nucor Steel Dynamics U.S. Steel WCI Weirton Steel Independent Steelworkers United Steelworkers of America
A-351-828	731-TA-806	Hot-rolled carbon steel flat products/ Brazil	Bethlehem Steel California Steel Industries Gallatin Steel Geneva Steel Gulf States Steel IPSCO Ispat/Inland LTV Steel National Steel Nucor Steel Dynamics U.S. Steel WCI Weirton Steel Independent Steelworkers United Steelworkers of America
A-821-809	731-TA-808	Hot-rolled carbon steel flat products/ Russia	Bethlehem Steel California Steel Industries Gallatin Steel Geneva Steel Gulf States Steel IPSCO Ispat/Inland LTV Steel National Steel Nucor Steel Dynamics U.S. Steel WCI Weirton Steel Independent Steelworkers United Steelworkers of America
A-427-814	731-TA-797	Stainless steel sheet and strip/ France	Allegheny Ludlum Armco Steel Bethlehem Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
A-428-825	731-TA-798	Stainless steel sheet and strip/ Germany	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
A-475-824	731-TA-799	Stainless steel sheet and strip/ Italy	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
A-588-845	731-TA-800	Stainless steel sheet and strip/ Japan	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
A-580-834	731-TA-801	Stainless steel sheet and strip/ Korea	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
A-201-822	731-TA-802	Stainless steel sheet and strip/ Mexico	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel North American Stainless United Steelworkers of America
A-583-831	731-TA-803	Stainless steel sheet and strip/ Taiwan	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-412-818	731-TA-804	Stainless steel sheet and strip/ United Kingdom	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
C-427-815	701-TA-380	Stainless steel sheet and strip/ France	Allegheny Ludlum Armco Steel Bethlehem Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
C-475-825	701-TA-381	Stainless steel sheet and strip/ Italy	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
C-580-835	701-TA-382	Stainless steel sheet and strip/ Korea	Allegheny Ludlum Armco Steel Bethlehem Steel J&L Specialty Steel Butler Armco Independent Union North American Stainless United Steelworkers of America Zanesville Armco Independent Organization
A-570-852	731-TA-814	Creatine monohydrate/China	Pfanstiehl Laboratories
C-427-817	701-TA-387	Cut-to-length carbon steel plate/ France	Bethlehem Steel Geneva Steel IPSCO Steel National Steel U.S. Steel United Steelworkers of America
C-533-818	701-TA-388	Cut-to-length carbon steel plate/ India	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			National Steel Tuscaloosa Steel U.S. Steel United Steelworkers of America
C-560-806	701-TA-389	Cut-to-length carbon steel plate/ Indonesia	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel National Steel Tuscaloosa Steel U.S. Steel United Steelworkers of America
C-475-827	701-TA-390	Cut-to-length carbon steel plate/Italy	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel National Steel U.S. Steel United Steelworkers of America
C-580-837	701-TA-391	Cut-to-length carbon steel plate/ Korea	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel National Steel Tuscaloosa Steel U.S. Steel United Steelworkers of America
A-427-816	731-TA-816	Cut-to-length carbon steel plate/ France	Bethlehem Steel Geneva Steel IPSCO Steel National Steel U.S. Steel United Steelworkers of America
A-533-817	731-TA-817	Cut-to-length carbon steel plate/ India	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel National Steel Tuscaloosa Steel U.S. Steel United Steelworkers of America
A-560-805	731-TA-818	Cut-to-length carbon steel plate/ Indonesia	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel National Steel Tuscaloosa Steel U.S. Steel United Steelworkers of America

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-475-826	731-TA-819	Cut-to-length carbon steel plate/Italy	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel National Steel U.S. Steel United Steelworkers of America
A-588-847	731-TA-820	Cut-to-length carbon steel plate/ Japan	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel Tuscaloosa Steel U.S. Steel United Steelworkers of America
A-580-836	731-TA-821	Cut-to-length carbon steel plate/ Korea	Bethlehem Steel Geneva Steel Gulf States Steel IPSCO Steel National Steel Tuscaloosa Steel U.S. Steel United Steelworkers of America
A-507-502	731-TA-287	Raw in-shell pistachios/Iran	Blackwell Land California Pistachio Orchard T.M. Duche Nut Keenan Farms Kern Pistachio Hulling & Drying Los Ranchos de Poco Pedro Pistachio Producers of California
C-507-501	None	Raw in-shell pistachios/Iran	No case at the Commission; no service list at Commerce
C-507-601	None	Roasted in-shell pistachios/Iran	No case at the Commission; no service list at Commerce
A-821-811	731-TA-856	Ammonium nitrate/ Russia	Agrium Air Products and Chemicals Mississippi Chemical El Dorado Chemical Nitram LaRoche Wil-Gro Fertilizer
A-580-839	731-TA-825	Polyester staple fiber/ Korea	E.I. du Pont de Nemours Arteva Specialties S.a.r.l. Wellman Intercontinental Polymers
A-583-833	731-TA-826	Polyester staple fiber/ Taiwan	Arteva Specialties S.a.r.l. Wellman Intercontinental Polymers
A-570-855	731-TA-841	Non-frozen apple juice concentrate/ China	Coloma Frozen Foods Green Valley Apples of California

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Knouse Foods Coop Mason County Fruit Packers Coop Tree Top
A-588-852	731-TA-853	Structural steel beams/Japan	Northwestern Steel and Wire Nucor Nucor-Yamato Steel TXI-Chaparral Steel United Steelworkers of America
C-580-842	701-TA-401	Structural steel beams/Korea	Northwestern Steel and Wire Nucor Nucor-Yamato Steel TXI-Chaparral Steel United Steelworkers of America
A-580-841	731-TA-854	Structural steel beams/Korea	Northwestern Steel and Wire Nucor Nucor-Yamato Steel TXI-Chaparral Steel United Steelworkers of America
A-570-856	731-TA-851	Synthetic indigo/China	Buffalo Color United Steelworkers of America
A-588-850	731-TA-847	Large-diameter carbon steel seamless pipe/Japan	North Star Steel Timken U.S. Steel USS/Kobe United Steelworkers of America
A-588-851	731-TA-847	Small-diameter carbon steel seamless pipe/Japan	Koppel Steel North Star Steel Sharon Tube Timken U.S. Steel USS/Kobe Vision Metals' Gulf States Tube United Steelworkers of America
A-791-808	731-TA-850	Small-diameter carbon steel seamless pipe/South Africa	Koppel Steel North Star Steel Sharon Tube Timken U.S. Steel USS/Kobe Vision Metals' Gulf States Tube United Steelworkers of America
A-485-805	731-TA-849	Small-diameter carbon steel seamless pipe/Romania	Koppel Steel North Star Steel Sharon Tube Timken

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			U.S. Steel USS/Kobe Vision Metals' Gulf States Tube United Steelworkers of America
A-201-827	731-TA-848	Large-diameter carbon steel seamless pipe/Mexico	North Star Steel Timken U.S. Steel USS/Kobe United Steelworkers of America
A-851-802	731-TA-846	Small-diameter carbon steel seamless pipe/Czech Republic	Koppel Steel North Star Steel Sharon Tube Timken U.S. Steel USS/Kobe Vision Metals' Gulf States Tube United Steelworkers of America
A-570-853	731-TA-828	Aspirin/China	Rhodia
A-580-812	731-TA-556	DRAMs of 1 megabit and above/ Korea	Micron Technology NEC Electronics Texas Instruments
A-475-828	731-TA-865	Stainless steel butt-weld pipe fittings/ Italy	Markovitz Enterprises Gerlin Shaw Alloy Piping Products Taylor Forge Stainless
A-557-809	731-TA-866	Stainless steel butt-weld pipe fittings/ Malaysia	Markovitz Enterprises Gerlin Shaw Alloy Piping Products Taylor Forge Stainless
A-565-801	731-TA-867	Stainless steel butt-weld pipe fittings/ Philippines	Markovitz Enterprises Gerlin Shaw Alloy Piping Products Taylor Forge Stainless
A-588-856	731-TA-888	Stainless steel angle/ Japan	Slater Steels United Steelworkers of America
A-580-846	731-TA-889	Stainless steel angle/ Korea	Slater Steels United Steelworkers of America
A-469-810	731-TA-890	Stainless steel angle/ Spain	Slater Steels United Steelworkers of America
A-588-015	AA1921-66	Television receivers/ Japan	AGIV (USA) Casio Computer CBM America Citizen Watch Funai Electric Hitachi Industrial Union Department

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Matsushita Mitsubishi Electric NEC Orion Electric J.C. Penny Philips Electronics Philips Magnavox P.T. Imports Sanyo Sharp Toshiba Toshiba America Consumer Products Victor Company of Japan Montgomery Ward Zenith Electronics
A-822-804	731-TA-873	Steel concrete reinforcing bar/ Belarus	AmeriSteel Auburn Steel Birmingham Steel Border Steel CMC Steel Group Marion Steel Nucor Steel Rebar Trade Action Coalition Riverview Steel Sheffield Steel
A-570-860	731-TA-874	Steel concrete reinforcing bar/ China	AmeriSteel Auburn Steel Birmingham Steel Border Steel CMC Steel Group Marion Steel Nucor Steel Rebar Trade Action Coalition Riverview Steel Sheffield Steel
A-560-811	731-TA-875	Steel concrete reinforcing bar/ Indonesia	AmeriSteel Birmingham Steel Border Steel CMC Steel Group Marion Steel Nucor Steel Rebar Trade Action Coalition Riverview Steel Sheffield Steel
A-580-844	731-TA-877	Steel concrete reinforcing bar/ Korea	AmeriSteel Auburn Steel Birmingham Steel Border Steel CMC Steel Group Marion Steel Nucor Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Rebar Trade Action Coalition Riverview Steel Sheffield Steel
A-449-804	731-TA-878	Steel concrete reinforcing bar/ Latvia	AmeriSteel Auburn Steel Birmingham Steel Border Steel CMC Steel Group Marion Steel Nucor Steel Rebar Trade Action Coalition Riverview Steel Sheffield Steel
A-841-804	731-TA-879	Steel concrete reinforcing bar/ Moldova	AmeriSteel Auburn Steel Birmingham Steel Border Steel CMC Steel Group Marion Steel Nucor Steel Rebar Trade Action Coalition Riverview Steel Sheffield Steel
A-455-803	731-TA-880	Steel concrete reinforcing bar/ Poland	AmeriSteel Auburn Steel Birmingham Steel Border Steel CMC Steel Group Marion Steel Nucor Steel Rebar Trade Action Coalition Riverview Steel Sheffield Steel
A-823-809	731-TA-882	Steel concrete reinforcing bar/ Ukraine	AmeriSteel Auburn Steel Birmingham Steel Border Steel CMC Steel Group Marion Steel Nucor Steel Rebar Trade Action Coalition Riverview Steel Sheffield Steel
A-823-810	731-TA-894	Ammonium nitrate/ Ukraine	Agrium Air Products and Chemicals Committee for Fair Ammonium Nitrate Trade El Dorado Chemical LaRoche Industries Mississippi Chemicals Nitram Prodica

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-570-862	731-TA-891	Foundry coke/China	ABC Coke Citizens Gas and Coke Utility Erie Coke Tonawanda Coke United Steelworkers of America
C-357-815	701-TA-404	Hot-rolled steel products/ Argentina	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-357-814	731-TA-898	Hot-rolled steel products/ Argentina	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-791-809	731-TA-905	Hot-rolled steel products/ South Africa	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-580-008	731-TA-134	Color television receivers/Korea	Independent Radionic Workers of America International Brotherhood of Electrical Workers International Union of Electrical, Radio and Machine Workers Industrial Union Department, AFL-CIO Committee to Preserve American Color television

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-583-009	731-TA-135	Color television receivers/Taiwan	Independent Radionic Workers of America International Brotherhood of Electrical Workers International Union of Electrical, Radio and Machine Workers Industrial Union Department, AFL-CIO Committee to Preserve American Color Television
A-122-006	AA1921-49	Steel jacks/Canada	Bloomfield Manufacturing (Harrah) Seaburn Metal Products
A-588-029	AA1921-85	Fish netting of man-made fiber/Japan	Jovanovich Supply LFSI Trans-Pacific Trading
A-588-038	AA1921-98	Bicycle speedometers/Japan	Avocet Cat Eye Diversified Products N.S. International Sanyo Electric Stewart-Warner
A-588-055	AA1921-154	Acrylic sheet/Japan	Polycast Technology
C-351-037	104-TAA-21	Cotton Yarn/Brazil	Harriet & Henderson Yarns LaFar Industries American Yarn Spinners Association
A-588-005	731-TA-48	High power microwave amplifiers/Japan	Aydin MCL
A-122-401	731-TA-196	Red raspberries/Canada	Rader farms Ron Roberts Shuksan Frozen Food Northwest Food Producers' Association Oregon Caneberry Commission Washington Red Raspberry Commission
A-588-405	731-TA-207	Cellular mobile telephones/Japan	E.F. Johnson Motorola
C-421-601	701-TA-278	Fresh cut flowers/Netherlands	Burdette Coward Gold Coast Uanko Nursery Hollandia Wholesale Florist Manatee Fruit Monterey Flower Farms Topstar Nursery California Floral Council Floral Trade Council Florida Flower Association
A-301-602	731-TA-329	Fresh cut flowers/Colombia	Burdette Coward Gold Coast Uanko Nursery Hollandia Wholesale Florist Manatee Fruit

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Monterey Flower Farms Pajaro Valley Greenhouses Topstar Nursery California Floral Council Floral Trade Council Florida Flower Association
A-331-602	731-TA-331	Fresh cut flowers/ Ecuador	Burdette Coward Gold Coast Uanko Nursery Hollandia Wholesale Florist Manatee Fruit Monterey Flower Farms Topstar Nursery California Floral Council Floral Trade Council Florida Flower Association
A-201-601	731-TA-333	Fresh cut flowers/ Mexico	Burdette Coward Gold Coast Uanko Nursery Hollandia Wholesale Florist Manatee Fruit Monterey Flower Farms Topstar Nursery California Floral Council Floral Trade Council Florida Flower Association
A-401-603	731-TA-354	Stainless steel hollow products/Sweden	AL Tech Specialty Steel Allegheny Ludlum Steel ARMCO Carpenter Technology Crucible Materials Damascus Tubular Products Specialty Tubing Group
A-508-604	731-TA-366	Industrial phosphoric acid/Israel	Albright & Wilson FMC Hydrite Chemical Monsanto Stauffer Chemical
A-588-802	731-TA-389	3.5" microdisks/Japan	Verbatim
A-588-809	731-TA-426	Small business tele- phone systems/ Japan	American Telephone & Telegraph Comdial Eagle Telephonic
A-583-806	731-TA-428	Small business tele- phone systems/ Taiwan	American Telephone & Telegraph Comdial Eagle Telephonic
A-580-803	731-TA-427	Small business tele- phone systems/ Korea	American Telephone & Telegraph Comdial Eagle Telephonic
A-570-811	731-TA-497	Tungsten ore concentrates/China	Curtis Tungsten U.S. Tungsten
A-427-804	731-TA-553	Hot-rolled lead and bismuth carbon steel products/ France	Bethlehem Steel Inland Steel Industries USS/Kobe Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
C-427-805	701-TA-315	Hot-rolled lead and bismuth carbon steel products/France	Bethlehem Steel Inland Steel Industries USS/Kobe Steel
A-588-823	731-TA-571	Professional electric cutting tools/Japan	Black & Decker
A-821-805	731-TA-697	Pure magnesium/Russia	Dow Chemical Magnesium Corporation of America International Union of Operating Engineers United Steelworkers of America
C-533-821	701-TA-405	Hot-rolled steel products/India	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
C-560-813	701-TA-406	Hot-rolled steel products/Indonesia	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
C-791-810	701-TA-407	Hot-rolled steel products/South Africa	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
C-549-818	701-TA-408	Hot-rolled steel products/Thailand	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-570-865	731-TA-899	Hot-rolled steel products/China	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-533-820	731-TA-900	Hot-rolled steel products/India	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-560-812	731-TA-901	Hot-rolled steel products/Indonesia	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-834-806	731-TA-902	Hot-rolled steel products/	Kazakhstan Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-421-807	731-TA-903	Hot-rolled steel products/ Netherlands	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Independent Steelworkers United Steelworkers of America
A-485-806	731-TA-904	Hot-rolled steel products/Romania	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Independent Steelworkers United Steelworkers of America
A-583-835	731-TA-906	Hot-rolled steel products/Taiwan	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-549-817	731-TA-907	Hot-rolled steel products/Thailand	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America
A-823-811	731-TA-908	Hot-rolled steel products/Ukraine	Bethlehem Steel Gallatin Steel IPSCO LTV Steel National Steel Nucor Steel Dynamics U.S. Steel Weirton Steel Independent Steelworkers United Steelworkers of America

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-570-864	731-TA-895	Pure magnesium (granular)/China	Concerned Employees of Northwest Alloys Magnesium Corporation of America United Steelworkers of America United Steelworkers of America (Local 8319)
A-588-857	731-TA-919	Welded large diameter line pipe/Japan	American Cast Iron Pipe Berg Steel Pipe Bethlehem Steel Napa Pipe/Oregon Steel Mills Saw Pipes USA Stupp U.S. Steel
A-201-828	731-TA-920	Welded large diameter line pipe/Mexico	American Cast Iron Pipe Berg Steel Pipe Bethlehem Steel Napa Pipe/Oregon Steel Mills Saw Pipes USA Stupp U.S. Steel
C-357-813	701-TA-402	Honey/Argentina	Adee Honey Farms Althoff Apiaries Anderson Apiaries Arroyo Apiaries Artesian Honey Producers Bailey Enterprises Barkman Honey Basler Honey Apiary Beals Honey Bears Paw Apiaries Beaverhead Honey Bee Biz Bee Haven Honey Belliston Brothers Apiaries Big Sky Honey Richard E. Blake Gene Brand Apiaries Curt Bronnenbery Brown's Honey Farms Brumley's Bees Buhmann Apiaries Carys Honey Farms Chaparrel Honey Mitchell Charles Charles Apiaries Collins Honey Conor Apiaries Coy's Honey Farm Delta Bee Eisele's Pollonation & Honey Ellingsoa's Elliott Curtis & Sons

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Charles L. Emmons, Sr. Gause Honey Griffith Honey Hamilton Bee Farms Hamilton Honey Happie Bee Harvest Honey Harvey's Honey Hiatt Honey Hoffman Honey Hollman Apiaries Honey House Honeybee Apiaries Gary M. Honl Rand William Honl and Sydney Jo Honl Jaynes Bee Products Larry Johnston American Beekeeping Federation American Honey Producers Association Sioux Honey Association Larry Johnston Honey Farms Ke-An Honey Kent Honeybees Lake-Indianhead Honey Farms Lamb's Honey Farm Laas Flores Apiaries Mackrill Honey Farms & Sales Raymond Marquette Mason & Sons Honey McCoy's Sunny South Apiaries Merrimack Valley Apiaries & Evergreen Honey Met 2 Honey Farm A.H. Meyer & Sons Missouri River Honey Mitchell Brothers Honey Monda Honey farm Montana Dakota Honey Dave Nelson Apiaries Northern Bloom Honey Noye's Apiaries Oakes Honey Oakley Honey Farms Old Mill Apiaries Opp Honey Oro Dulce Steve E. Parks Apiaries Peterson's Naturally Sweet Honey

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Potoczak Bee Farms Price Apiaries Pure Sweet Honey Farms Bill Rhodes Honey Robertson Pollination Service William Robson Robson Honey Rosedale Apiaries Ryan Apiaries Schmidt Honey Farms Simpson Apiaries James R. & Joan Smith Trust Smoot Honey Solby Honey Stahlman Apiaries Stroope Bee & Honey T&D Honey Bee Talbott's Honey Terry Apiaries Thompson Apiaries Triple A Farm Tropical Blossom Honey Tubbs Apiaries Venable Wholesale B. Weaver Apiaries Wiebersiek Honey Farms Walter L. Wilson Buzz 76 Apiaries Wilmer Farms Brent J. Woodworth Wooten's Golden Queens Yaddof Apiaries American Beekeeping Federation American Honey Products Association Sioux Honey Association
A-357-812	731-TA-892	Honey/Argentina	Adee Honey Farms Althoff Apiaries Anderson Apiaries Arroyo Apiaries Artesian Honey Producers Bailey Enterprises Barkman Honey Basler Honey Apiary Beals Honey Bears Paw Apiaries Beaverhead Honey Bee Biz Bee Haven Honey Belliston Brothers Apiaries Big Sky Honey Richard E. Blake Gene Brandi Apiaries Curt Bronnenbery

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Brown's Honey Farms Brumley's Bees Buhmann Apiaries Carys Honey Farms Chaparrel Honey Mitchell Charles Charles Apiaries Collins Honey Conor Apiaries Coy's Honey Farms Delta Bee Eisele's Pollination & Honey Ellingsoa's Elliott Curtis & Sons Charles L. Emmons, SR. Gause Honey Griffith Honey Hamilton Bee Farms Hamilton Honey Happie Bee Harvest Honey Harvey's Honey Hiatt Honey Hoffman Honey Hollman Apiaries Honey House Honeybee Apiaries Gary M. Honi Rand William Honi and Sydney Jo Honi American Beekeeping Federation American Honey Producers Association Sioux Honey Association Jaynes Bee Products Larry Johnston Johnston Honey Farms Ke-An Honey Kent Honeybees Lake Indianhead Honey Farms Lamb's Honey Farms Las Flores Apiaries Mackrill Honey Farms & Sales Raymond Marquette Mason & Sons Honey McCoy's Sunny South Apiaries Merrimack Valley Apiaries & Evergreen Honey Met 2 Honey Farm A.H. Meyers & Sons Missouri River Honey Mitchell Brothers Honey

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Monda Honey Farm Montana Dakota Honey Dave Nelson Apiaries Northern Bloom Honey Noye's Apiaries Oakes Honey Oakley Honey Farms Old Mill Apiaries Opp Honey Oro Dulce Steve E. Park Apiaries Petersons Naturally Sweet Honey Potoczak Bee Farms Price Apiaries Pure Sweet Honey Farm Bill Rhodes Honey Robertson Pollination Service William Robson Robson Honey Rosedale Apiaries Ryan Apiaries Schmidt Honey Farms Simpson Apiaries James R. & Joan Smith Trust Smoot Honey Solby Honey Stahlman Apiaries Stroope Bee & Honey T&D Honey Bee Talbott's Honey Terry Apiaries Thompson Apiaries Triple-A Farm Tropical Blossom Honey Tubbs Apiaries Venable Wholesale B. Weaver Apiaries Wiebersiek Honey Farms Walter L. Wilson Buzz 76 Apiaries Wilmer Farms Brent J. Woodworth Wooten Golden Queens Yaddof Apiaries American Beekeeping Federation American Honey Producers Association Sioux Honey Association
A-570-863	731-TA-893	Honey/China	Adee Honey Farms Althoff Apiaries Anderson Apiaries Arroyo Apiaries Artesian Honey Producers Bailey Enterprises Barkman Honey

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Basler Honey Apiary Beals Honey Bears Paw Apiaries Beaverhead Honey Bee Biz Bee Haven Honey Belliston Brothers Apiaries Big Sky Honey Richard E. Blake Gene Brandi Apiaries Curt Bronnenbery Brown's Honey Farms Brumley's Bees Buhmann Apiaries Carys Honey Farms Chaparrel Honey Mitchell Charles Charles Apiaries Collins Honey Conor Apiaries Coy's Honey Farm Delta Bee Eisele's Pollination & Honey Ellingsoa's Elliott Curtis & Sons Charles L. Emmons, Sr. Gause Honey Griffith Honey Hamilton Bee Farms Hamilton Honey Happie Bee Harvest Honey Hiatt Honey Hoffman Honey Hollman Apiaries Honey House Honeybee Apiaries Gary M. Honi Rand William Honi and Sydney Jo Honi Jaynes Bee Products Larry Johnston Johnston Honey Farms Ke-An Honey Kent Honeybees Lake-Indianhead Honey Farms Lamb's Honey Farm Las Flores Apiaries Mackrill Honey Farms & Sales Raymond Marquette Mason & Sons Honey McCoy's Sunny South Apiaries Merrimack Valley Apiaries & Evergreen Honey Met 2 Honey Farm

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			A.H. Meyer & Sons Missouri River Honey Mitchell Brothers Honey Monda Honey Farm Montana Dakota Honey Dave Nelson Apiaries Northern Bloom Honey Noye's Apiaries Oakes Honey Oakley Honey Farms Old Mill Apiaries Opp Honey Oro Dulce Steve E. Park Apiaries Peterson's Naturally Sweet Honey Potoczak Bee Farms Price Apiaries Pure Sweet Honey Farms Bill Rhodes Honey Robertson Pollination Service William Robson Robson Honey Rosedale Apiaries Ryan Apiaries Schmidt Honey Farms Simpson Apiaries James R. & Joann Smith Trust Smoot Honey Solby Honey Stahlman Apiaries Stroope Bee & Honey T&D Honey Bee Talbot's Honey Terry Apiaries Thompson Apiaries Triple-A Farm Tropical Blossom Honey Tubbs Apiaries Venable Wholesale B. Weaver Apiaries Wiebersiek Honey Farms Walter L. Wilson Buzz 76 Apiaries Wilmer Farms Brent J. Woodworth Wooten's Golden Queens Yaddof Apiaries American Beekeeping Federation American Honey Producers Association Sioux Honey Association

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-122-838	731-TA-928	Softwood lumber/ Canada	Anthony Timberlands Ball Lumber Buddy Bean Lumber Bearden Lumber Guy Bennett Lumber Bennett Lumber Blue Mountain Lumber Charleston Heart Pine Chesterfield Lumber Chips Clearwater Forest Industries Collums Lumber Contoocook River lumber Elliott Sawmilling Evergreen Forest Products Flippo Lumber Frontier Resources Georgia Lumber Gilman Building Products Godfrey Lumber Conway Guiteau Lumber Gulf Lumber Gulf States Paper Ralph Hamel Forest Products Hampton Resources Hancock Lumber Harrigan Lumber Hatfield Lumber Hedstrom Lumber Hood Industries Claude Howard Lumber International Paper D.R. Johnson Lumber J.W. Jones Lumber Keller Lumber Konkolville Lumber Langdale Forest Products Mason Lumber Randy D. Miller Lumber Moose River Lumber Nagel Lumber New South Nicolet Hardwoods Nieman Sawmills SD Nieman Sawmills WY North Florida Owens and Hurst Lumber Page & Hill Forest Products Parker Lumber PBS Lumber Plum Creek Timber Pollard Lumber Portac Potlatch Potomac Supply

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Riley Creek Lumber Robbins Lumber Seneca Sawmill Shearer Lumber Products Shuqualak Lumber Sierra Pacific Industries South Coast Southern Lumber Stimson Lumber S.I. Story Lumber Superior lumber Swift Lumber Tamarack Mill Fred Tebb & Sons Temple-Inland Forest Products Three Rivers Timber Tolleson Lumber Toney Lumber Tri-State Lumber Jerry G. Williams & Sons Wyoming Sawmills R.A. Yancey Lumber Coalition for Fair Lumber Imports Executive Committee Paper, Allied-Industrial, Chemical and Energy Workers International Union United Brotherhood of Carpenters and Joiners
C-122-839	701-TA-414	Softwood lumber/ Canada	Anthony Timberlands Ball Lumber Buddy Bean Lumber Bearden Lumber Guy Bennett Lumber Bennett Lumber Blue Mountain Lumber Charleston Heart Pine Chesterfield Lumber Chips Clearwater Forest Industries Collums Lumber Contoocook River Lumber Elliott Sawmilling Evergreen Forest Products Flippo Lumber Frontier Resources Georgia Lumber Gilman Building Products Godfrey Lumber Conway Guiteau Lumber Gulf Lumber Gulf States Paper Ralph Hamel Forest Products

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			<p>Hampton Resources Hancock Lumber Harrigan Lumber Hatfield Lumber Hedstrom Lumber Hood Industries Claude Howard Lumber International Paper D.R. Johnson Lumber J.W. Jones Lumber Keller Lumber Konkolville Lumber Langdale Forest Products Mason Lumber Randy D. Miller Lumber Moose River Lumber Nagel Lumber New South Nicolet Hardwoods Nieman Sawmills SD Nieman Sawmills WY North Florida Owens and Hurst Lumber Page & Hill Forest Products Parker Lumber PBS Lumber Plum Creek Timber Pollard Lumber Portac Potlatch Potomac Supply Seago Lumber Seattle-Snohomish Seneca Sawmill Shearer Lumber Products Shuqualak Lumber Sierra Pacific Industries South Coast Southern Lumber Stimson Lumber S.I. Story Lumber Superior Lumber Swift Lumber Tamarack Mill Fred Tebb & Sons Temple-Inland Forest Products Three Rivers Timber Tolleson Lumber Toney Lumber Tri-State Lumber Jerry G. Williams & Sons Wyoming Sawmills R.A. Yancey Lumber Coalition for Fair Lumber Imports Executive Committee</p>

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Paper, Allied-Industrial, Chemical and Energy Workers International Union United Brotherhood of Carpenters and Joiners
A-533-823	731-TA-929	Silicomanganese/Canada	Eramet Marietta Paper, Allied-Industrial, Chemical and Energy Workers International Union, Local 5-0639
A-834-807	731-TA-930	Silicomanganese/Kazakhstan	Eramet Marietta Paper, Allied-Industrial, Chemical and Energy Workers International, Local 5-0639
A-307-820	731-TA-931	Silicomanganese/Venezuela	Eramet Marietta Paper, Allied-Industrial, Chemical and Energy Workers International Union, Local 5-0639
A-570-868	731-TA-932	Folding metal tables and chairs/China	Krueger International McCourt Manufacturing Meco Virco Manufacturing
C-533-825	731-TA-415	Polyethylene terephthalate film, sheet and strip (PET film)/India	DuPont Teijin Films Mitsubishi Polyester Film of America Toray Plastics (America)
A-533-824	731-TA-933	Polyethylene terephthalate film, sheet, and strip (PET film)/India	DuPont Teijin Films Mitsubishi Polyester Film of America Toray Plastics (America)
A-583-837	731-TA-934	Polyethylene terephthalate film, sheet and strip (PET film)/Taiwan	DuPont Teijin Films Mitsubishi Polyester Film of America Toray Plastics (America)
A-337-806	731-TA-948	Individually quick frozen red raspberries/Chile	A&A Berry Farms Bahler Farms Bear Creek Farms David Burns Columbia Farms Columbia Fruit George Culp Dobbins Berry Farm Enfield Firestone Packing Heckel Farms George Hoffman Farms Wendell Kreder Curt Maberry Maberry Packing Mike & Jean's Nguyen Berry Farms Nick's Acres

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			North Fork Parson Berry Farm Pickin 'N = Pluckin Postage Stamp Farm Rader RainSweet Scenic Fruit Silverstar Farms Tim Straub Theony Farms Townsend Tsugawa Farms Uddike Berry Farms Van Laeken Farms
A-570-866	731-TA-921	Folding gift boxes/ China	Field Container Harvard Folding Box Sterling Packaging Superior Packaging
A-427-818	731-TA-909	Low enriched Uranium/France	USEC
C-427-819	701-TA-409	Low enriched Uranium/France	USEC
C-428-829	701-TA-410	Low enriched Uranium/Germany	USEC
C-421-809	701-TA-411	Low enriched Uranium/ Netherlands	USEC
C-412-821	701-TA-412	Low enriched Uranium/United Kingdom	USEC
A-427-820	731-TA-913	Stainless steel bar/ France	Carpenter Technology Crucible Specialty Metals Electralloy Empire Specialty Steel
			Republic Technologies International Slater Steels United Steelworkers of America
A-428-830	731-TA-914	Stainless steel bar/ Germany	Carpenter Technology Crucible Specialty Metals Electralloy Empire Specialty Steel Republic Technologies International Slater Steels United Steelworkers of America
A-475-829	731-TA-915	Stainless steel bar/ Italy	Carpenter Technology Crucible Specialty Metals Electralloy Empire Specialty Steel

Commerce case number	Commission case number	Product/country	Petitioners/supporters
			Republic Technologies International Slater Steels United Steelworkers of America
A-580-847	731-TA-916	Stainless steel bar/ Korea	Carpenter Technology Crucible Specialty Metals Electralloy Empire Specialty Steel Republic Technologies International Slater Steels United Steelworkers of America
A-412-822	731-TA-918	Stainless steel bar/ United Kingdom	Carpenter Technology Crucible Specialty Metals Electralloy Empire Specialty Steel Republic Technologies International Slater Steels United Steelworkers of America
C-475-830	701-TA-413	Stainless steel bar/ Italy	Carpenter Technology Crucible Specialty Metals Electralloy Empire Specialty Steel Republic Technologies International Slater Steels United Steelworkers of America
A-570-867	731-TA-922	Automotive replacement glass windshields/China	Apogee Enterprises PPG Industries Safelite Glass Visteon Corporation
A-570-873	731-TA-986	Ferrovanadium/ China	Bear Metallurgical Corp. Shieldalloy Metallurgical Corp.
A-791-815	731-TA-987	Ferrovanadium/ South Africa	Bear Metallurgical Co. Shieldalloy Metallurgical Corp.
C-351-833	701-TA-417	Carbon and certain alloy steel wire rod/ Brazil	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills

Commerce case number	Commission case number	Product/country	Petitioners/supporters
C-122-841	701-TA-418	Carbon and certain alloy steel wire rod/ Canada	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills
A-351-832	731-TA-953	Carbon and certain alloy steel wire rod/ Brazil	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills
A-122-840	731-TA-954	Carbon and certain alloy steel wire rod/ Canada	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills
A-560-815	731-TA-957	Carbon and certain alloy steel wire rod/ Indonesia	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills
A-201-830	731-TA-958	Carbon and certain alloy steel wire rod/ Mexico	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills

Commerce case number	Commission case number	Product/country	Petitioners/supporters
A-841-805	731-TA-959	Carbon and certain alloy steel wire rod/ Moldova	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills
A-274-804	731-TA-961	Carbon and certain alloy steel wire rod/ Trinidad & Tobago	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills
A-823-812	731-TA-962	Carbon and certain alloy steel wire rod/ Ukraine	AmeriSteel Birmingham Steel Cascade Steel Rolling Mills Co-Steel Raritan GS Industries Keystone Consolidated Industries North Star Steel Texas Republic Technologies International Rocky Mountain Steel Mills
C-437-805	701-TA-426	Sulfanilic acid/ Hungary	Nation Ford Chemical
A-437-804	731-TAB426	Sulfanilic acid/ Hungary	Nation Ford Chemical
A-471-806	731-TA-427	Sulfanilic acid/ Portugal	Nation Ford Chemical
A-821-817	731-TA-991	Silicon metal/Russia	Globe Metallurgical Inc. SIMCALA, Inc.
A-570-875	731-TA-990	Non-malleable cast iron pipe fittings/ China	Anvil International, Inc. Buck Co., Inc. Frazier & Frazier Industries Ward Manufacturing, Inc.
A-588-854	731-TA-860	Tin-mill products/ Japan	Weirton Steel Independent Steelworkers United Steelworkers of America

[CBP Decision 03-06]

CUSTOMS ACCREDITATION OF INTERTEK TESTING SERVICES/CALEB BRETT AS A COMMERCIAL LABORATORY

AGENCY: Customs and Border Protection, Department of Homeland Security

ACTION: Notice of Accreditation of Intertek Testing Services/Caleb Brett of Texas City, Texas, as a Commercial Laboratory.

SUMMARY: Intertek Testing Services/Caleb Brett of Texas City, Texas has applied to Customs and Border Protection under Part 151.12 of the Customs Regulations for an extension of accreditation as a commercial laboratory to analyze petroleum products under Chapter 27 and Chapter 29 of the Harmonized Tariff Schedule of the United States (HTSUS). Customs has determined that this company meets all of the requirements for accreditation as a commercial laboratory. Specifically, Intertek Testing Services/Caleb Brett has been granted accreditation to perform the following test methods at their Texas City, Texas site: (1) Distillation of Petroleum Products, ASTM D86; (2) Flash-Point by Pensky Martens Closed Cup Tester, ASTM D93; (3) API Gravity by Hydrometer, ASTM D287; (4) Kinematic Viscosity of Transparent and Opaque Liquids, ASTM D445; (5) Sediment in Crude Oils and Fuel Oils by Extraction, ASTM D473; (6) Water in Crude Oil by Distillation, ASTM D4006; (7) Water and Sediment in Crude Oil by the Centrifuge Method, ASTM D4007; (8) Percent by Weight of Sulfur by Energy-Dispersive X-Ray Fluorescence, ASTM D4294; (9) Water in Crude Oils by Coulometric Karl Fischer Titration, ASTM D4928; (10) Density and Relative Density of Crude Oils by Digital Density Analyzer, ASTM D 5002; (11) Vapor Pressure of Petroleum Products, ASTM D5191; and (12) Pour Point of Crude Oils, ASTM D 5853. Therefore, in accordance with Part 151.12 of the Customs Regulations, Intertek Testing Services/Caleb Brett of Texas City, Texas is hereby accredited to analyze the products named above.

LOCATION: Intertek Testing Services/Caleb Brett accredited site is located at: 101 20th Street South, Texas City, TX 77590.

EFFECTIVE DATE: July 1, 2003

FOR FURTHER INFORMATION CONTACT: Arlene Faustermann, Science Officer, Laboratories and Scientific Services, Customs and Border Protection, 1300 Pennsylvania Avenue, NW, Suite 1500 North, Washington, D.C. 20229, (202) 927-1060.

Dated: July 1, 2003

IRA S. REESE,
*Executive Director,
Laboratories and Scientific Services.*

[CBP Decision 03-07]

CUSTOMS ACCREDITATION OF ALCHEM LABORATORY, INC.
AS A COMMERCIAL LABORATORY

AGENCY: Customs and Border Protection, Department of Homeland Security

ACTION: Notice of Accreditation of Alchem Laboratory, Inc. of Ponce, Puerto Rico, as a Commercial Laboratory.

SUMMARY: Alchem Laboratory, Inc. of Ponce, Puerto Rico has applied to Customs and Border Protection under Part 151.12 of the Customs Regulations for an extension of accreditation as a commercial laboratory to analyze petroleum products under Chapter 27 and Chapter 29 of the Harmonized Tariff Schedule of the United States (HTSUS). Customs has determined that this company meets all of the requirements for accreditation as a commercial laboratory. Specifically, Alchem Laboratory, Inc. has been granted accreditation to perform the following test methods at their Ponce, Puerto Rico site: (1) Distillation of Petroleum Products, ASTM D86; (2) Kinematic Viscosity of Transparent and Opaque Liquids, ASTM D445; (3) Density, Relative Density (Specific Gravity), or API Gravity of Crude Petroleum and Liquid Petroleum Products by Hydrometer Method, ASTM D1298; (4) Percent by Weight of Sulfur by Energy-Dispersive X-Ray Fluorescence, ASTM D4294. Therefore, in accordance with Part 151.12 of the Customs Regulations, Alchem Laboratory, Inc. of Ponce, Puerto Rico is hereby accredited to analyze the products named above.

LOCATION: Alchem Laboratory, Inc. accredited site is located at: Sabanetas Industrial Park, Building M-1380, Ponce, PR 00731.

EFFECTIVE DATE: July 1, 2003

FOR FURTHER INFORMATION CONTACT: Arlene Faustermann, Science Officer, Laboratories and Scientific Services, Customs and Border Protection, 1300 Pennsylvania Avenue, NW, Suite 1500 North, Washington, D.C. 20229, (202) 927-1060.

Dated: July 1, 2003

IRA S. REESE,
Executive Director,
Laboratories and Scientific Services.

DEPARTMENT OF HOMELAND SECURITY,
OFFICE OF THE COMMISSIONER OF CUSTOMS.

Washington, DC, July 9, 2003,

The following documents of the Bureau of Customs and Border Protection ("CBP"), Office of Regulations and Rulings, have been determined to be of sufficient interest to the public and CBP field offices to merit publication in the CUSTOMS BULLETIN.

MICHAEL T. SCHMITZ,
*Assistant Commissioner,
Office of Regulations and Rulings.*

19 CFR PART 177

PROPOSED REVOCATION OF RULING LETTER AND TREATMENT RELATING TO THE TARIFF CLASSIFICATION OF MET-PLUS, A RUMEN PROTECTED METHIONINE ADDITIVE

AGENCY: Bureau of Customs and Border Protection, Department of Homeland Security

ACTION: Notice of proposed revocation of tariff classification ruling letter and treatment relating to the classification of Met-Plus, a rumen protected methionine additive.

SUMMARY: Pursuant to section 625(c), Tariff Act of 1930 (19 U.S.C. 1625 (c)), as amended by section 623 of Title VI (Customs Modernization) of the North American Free Trade Agreement Implementation Act (Pub. L. 103-182, 107 Stat. 2057), this notice advises interested parties that Customs intends to revoke a ruling concerning the tariff classification of Met-Plus, a rumen protected methionine additive under the Harmonized Tariff Schedule of the United States (HTSUS). Similarly, Customs intends to revoke any treatment previously accorded by Customs to substantially identical transactions. Comments are invited on the correctness of the proposed actions.

DATE: Comments must be received on or before August 25, 2003.

ADDRESS: Written comments are to be addressed to Bureau of Customs and Border Protection, Office of Regulation and Rulings, Attention: Regulations Branch, 1300 Pennsylvania Avenue, N.W., Washington, D.C. 20229. Comments submitted may be inspected at 799 9th St. N.W. during regular business hours. Arrangements to inspect submitted comments should be made in advance by calling Mr. Joseph Clark at (202) 572-8768.

FOR FURTHER INFORMATION CONTACT: Allyson Mattanah,
General Classification Branch, (202) 572-8784.

SUPPLEMENTARY INFORMATION:

BACKGROUND

On December 8, 1993, Title VI (Customs Modernization), of the North American Free Trade Agreement Implementation Act (Pub. L. 103-182, 107 Stat. 2057) (hereinafter "Title VI"), became effective. Title VI amended many sections of the Tariff Act of 1930, as amended, and related laws. Two new concepts which emerge from the law are "**informed compliance**" and "**shared responsibility**." These concepts are premised on the idea that in order to maximize voluntary compliance with Customs laws and regulations, the trade community needs to be clearly and completely informed of its legal obligations. Accordingly, the law imposes a greater obligation on Customs to provide the public with improved information concerning the trade community's responsibilities and rights under the Customs and related laws. In addition, both the trade and Customs share responsibility in carrying out import requirements. For example, under section 484 of the Tariff Act of 1930, as amended (19 U.S.C. § 1484), the importer of record is responsible for using reasonable care to enter, classify and value imported merchandise, and provide any other information necessary to enable Customs to properly assess duties, collect accurate statistics and determine whether any other applicable legal requirement is met.

Pursuant to section 625(c)(1), Tariff Act of 1930 (19 U.S.C. 1625(c)(1)), as amended by section 623 of Title VI (Customs Modernization) of the North American Free Trade Agreement Implementation Act (Pub. L. 103-182, 107 Stat. 2057), this notice advises interested parties that Customs intends to revoke a ruling pertaining to the tariff classification of Met-Plus, a rumen protected methionine additive. Although in this notice Customs is specifically referring to New York Ruling Letter (NY) I83524, dated July 31, 2002, this notice covers any rulings on this merchandise which may exist but have not been specifically identified. Customs has undertaken reasonable efforts to search existing data bases for rulings in addition to the one identified. No further rulings have been found. This notice will cover any rulings on this merchandise that may exist but have not been specifically identified. Any party who has received an interpretive ruling or decision (i.e., ruling letter, internal advice memorandum or decision or protest review decision) on the merchandise subject to this notice should advise Customs during this notice period.

Similarly, pursuant to section 625(c)(2), Tariff Act of 1930 (19 U.S.C. 1625(c)(2)), as amended by section 623 of Title VI, Customs intends to revoke any treatment previously accorded by Customs to substantially identical transactions. This treatment may, among

other reasons, be the result of the importer's reliance on a ruling issued to a third party, Customs personnel applying a ruling of a third party to importations of the same or similar merchandise, or the importer's or Customs previous interpretation of the Harmonized Tariff Schedule of the United States (HTSUS). Any person involved in substantially identical transactions should advise Customs during this notice period. An importer's failure to advise Customs of substantially identical transactions or of a specific ruling not identified in this notice may raise issues of reasonable care on the part of the importer or his agents for importations of merchandise subsequent to this notice.

In NY I83524, the merchandise was classified in subheading 3824.90.28, HTSUS, which provides for "[p]repared binders for foundry molds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included: [o]ther: [o]ther, [m]ixtures containing 5 percent or more by weight of one or more aromatic or modified aromatic substances: [o]ther." NY I83524 is set forth as Attachment A to this document.

It is now Customs position that this substance was not correctly classified in NY I83524 because it is more specifically provided for in subheading 2309.90.95, HTSUS, the provision for: "[p]reparations of a kind used in animal feeding: [o]ther: [o]ther: [o]ther: [o]ther: [o]ther."

Customs, pursuant to 19 U.S.C. 1625(c)(1), intends to revoke NY I83524 and any other ruling not specifically identified, to reflect the proper classification of the merchandise pursuant to the analysis set forth in proposed HQ 966069, which is set forth as Attachment B to this document. Additionally, pursuant to 19 U.S.C. 1625(c)(2), Customs intends to revoke any treatment previously accorded by Customs to substantially identical transactions. Before taking this action, consideration will be given to any written comments timely received.

Dated: July 2, 2003

GERARD J. O'BRIEN JR.,
(for Myles B. Harmon, Director,
Commercial Rulings Division).

[Attachments]

[ATTACHMENT A]

DEPARTMENT OF HOMELAND SECURITY,
BUREAU OF CUSTOMS AND BORDER PROTECTION,

NY 183524
July 31, 2002
CLA-2-38:RR-NC:2:231 183524
CATEGORY: Classification
TARIFF NO.: 3824.90.2800

MR. JOHN PETERSON, Esq.
NEVILLE, PETERSON LLP
80 Broad Street, 34th Floor
New York, NY 10004

RE: The tariff classification of a methionine based mixture from Japan.

DEAR MR. PETERSON:

In your letter, dated July 2, 2002, you requested a tariff classification ruling on behalf of your client, BioZyme, Inc., St. Joseph, MO.

The merchandise, "Met-Plus," is a methionine based mixture in the form of a fine, granular material. The product is a mixture of DL-methionine (C₅H₁₁NO₂S), calcium salts of long-chain fatty acids, lauric acid, and the preservative BHT. The methionine accounts for 65 percent of the product's total content, by weight. "Met-Plus" will be used as supplementary cattle feed.

In your correspondence you note that the classification of this product was the subject of an earlier ruling request (i.e., NYRL H86670, dated March 18, 2002), filed on behalf of Nisso America, Inc. Your state that your client, BioZyme, Inc., who is now responsible for the importation of this product, disagrees with the classification in the New York ruling letter and wishes to have that ruling reconsidered. Since your client was not the party to whom the ruling was issued, we cannot accept your letter as a request for reconsideration. Further, your letter states that the issued posed by this request have not previously been decided by the Customs Service. We disagree.

Briefly, you state that this DL-Methionine is used only as an animal feed supplement, that it is within the ambit of the Explanatory Notes (EN) to heading 23.09 and that, therefore, the product is not classifiable in heading 38.24, as a preparation of the chemical or allied industries, *nesoi*.

First, we would point out that not all substances, which may be used in, or added to, animal feeding preparations, are classifiable in heading 23.09. In fact, the first paragraph of the EN defines the scope of the entire heading, the balance of the note being read in the context of these initial provision. parameters. Thus, the EN state that "This heading covers sweetened forage and prepared animal feeding stuffs consisting of a mixture of several nutrients designed: (1) to provide the animal with a rational and balanced daily diet (complete feed); (2) to achieve a suitable daily diet by supplementing the basic farm-produced feed with organic or inorganic substances (supplementary feed); or (3) for use in making complete or supplementary feeds". [Bold-face added for emphasis.] Thus, NYRL 807746, March 13, 1995, classified the compound DL-Methionine (CAS No. 59-51-8), which was used as an ingredient in pet food, as an organic compound in heading 29.30, HTSUS. In HQRL 089931, October 15, 1991, Customs classified certain rawhide dog chews, "coated with a beef flavoring, dried and packaged," although principally eaten by dogs, but consisting only one component (namely, of flavored proteinaceous hide strips), in heading 05.11, HTSUS, as Animal products not elsewhere specified or included; dead animals of chapter 1 or 3, unfit for human consumption. In contrast, Methionine, when imported in a mixture of several nutrient ingredients as a preparation for use in animal feeding, has been classified in heading 23.09, HTSUS. See, for example, HQRLs 957213, January 4, 1995, and 953755, September 3, 1993, and NYRL D82484, October 2, 1998. Accordingly, the fact that the instant product has a use as a feedstuff additive, described in items (1), (2) or (3) of the referenced EN, above, or in one of the subsections thereunder, is not determinative of its classification in heading 23.09. In a ruling dated June 21, 2001, Headquarters addressed a similar situation in classifying a product called BHA-75, a pre-

servative used in animal feed. The inquired contended that the product was described in the EN to heading 23.09, based on its use as a preservative additive. In ruling, HQs responded to that claim, as follows: "You argue that EN 23.09(II)(C)(2) allow preparations, such as antioxidants, designed to preserve the feeding stuffs, to be included in classification under heading 2309, HTSUS. A close reading of the entire EN proves this argument incorrect.

"EN 23.09(II)(C)(2) must be read in the context of both the entire EN and the whole of subpart (II)(C). The first paragraph of the EN clearly defines the scope of the heading as those preparation which consist of a mixture of several nutrients. (emphasis added). It is undisputed that BHA-75 has no nutritive value."

Based on the foregoing, we would conclude that a preparation of DL-Methionine, mixed with functional ingredients, such as calcium salts of long-chain fatty acids and lauric acid, and the preservative BHT, are not preparations of a kind used in animal feeding, as provided for in heading 23.09, HTSUS.

Accordingly, the applicable subheading for "Met-Plus" will be 3824.90.2800, Harmonized Tariff Schedule of the United States (HTS), which provides for prepared binders for foundry molds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included; residual products of the chemical or allied industries, not elsewhere specified or included: mixtures containing 5 percent or more by weight of one or more aromatic or modified aromatic substances: other. The rate of duty will be 0.7 cents per kilogram plus 7.9 percent *ad valorem*.

This ruling is being issued under the provisions of Part 177 of the Customs Regulations (19 CFR 177).

A copy of the ruling or the control number indicated above should be provided with the entry documents filed at the time this merchandise is imported. If you have any questions regarding the ruling, contact National Import Specialist Thomas Brady at (646) 733-3030.

ROBERT B. SWIERUPSKI,
Director,
National Commodity Specialist Division.

[ATTACHMENT B]

DEPARTMENT OF HOMELAND SECURITY.
BUREAU OF CUSTOMS AND BORDER PROTECTION,
HQ 966203
CLA-2 RR:CR:GC 966203 AM
CATEGORY: CLASSIFICATION
TARIFF NO.: 2309.90.95

MR. JOHN M. PETERSON
NEVILLE PETERSON LLP
80 Broad Street, 34th Floor
New York, N.Y. 10004

Re: New York Ruling Letter I83524; Met-Plus, a rumen protected methionine additive

Dear MR. PETERSON:

This is our decision regarding your letter, dated January 23, 2003, addressed to the Director, National Commodity Specialist Division, on behalf of your client, BioZyme Inc., requesting reconsideration of New York Ruling Letter (NY) I83524, dated July 31, 2002, regarding the tariff classification, pursuant to the Harmonized Tariff Schedule of the United States (HTSUS), of Met-Plus, a rumen protected methionine additive. Your letter was forwarded to this office for reply. We have reviewed this ruling and believe it is incorrect.

FACTS:

DL-Methionine, an amino acid essential for milk production in dairy cows, has the chemical formula $C_2H_{11}NO_2S$ and is assigned the CAS number 59-51-81. Met-Plus is a coated methionine product which increases the amount of post-ruminally available methionine in dairy cows. It is a white, fine grain mixture that consists of a minimum of 65% DL-Methionine, calcium salts of long-chain fatty acids, lauric acid and BHT as a preservative in the calcium salts.

In NY 183524, the merchandise was classified in subheading 3824.90.28, HTSUS, which provides for: "[p]repared binders for foundry molds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included: [o]ther: [o]ther: [m]ixtures containing 5 percent or more by weight of one or more aromatic or modified aromatic substances: [o]ther."

ISSUE:

Is Met-Plus an animal feed supplement under the HTSUS?

LAW AND ANALYSIS:

Merchandise imported into the United States is classified under the HTSUS. Tariff classification is governed by the principles set forth in the General Rules of Interpretation (GRIs) and, in the absence of special language or context which requires otherwise, by the Additional U.S. Rules of Interpretation. The GRIs and the Additional U.S. Rules of Interpretation are part of the HTSUS and are to be considered statutory provisions of law for all purposes.

GRI 1 requires that classification be determined first according to the terms of the headings of the tariff schedule and any relative section or chapter notes and, unless otherwise required, according to the remaining GRIs taken in order. GRI 6 requires that the classification of goods in the subheadings of headings shall be determined according to the terms of those subheadings, any related subheading notes and *mutatis mutandis*, to the GRIs.

In understanding the language of the HTSUS, the Explanatory Notes (ENs) of the Harmonized Commodity Description and Coding System may be utilized. The ENs, although not dispositive or legally binding, provide a commentary on the scope of each heading, and are generally indicative of the proper interpretation of the HTSUS. See T.D. 89-80, 54 Fed. Reg. 35127 (August 23, 1989).

The HTSUS headings under consideration are as follows:

2309	Preparations of a kind used in animal feeding:
2309.90	Other:
	Other:
	Other:
	Other:
2309.90.95	Other
*	* * * * *
3824	Prepared binders for foundry molds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included:
3824.90	Other:
	Other:
	Mixtures containing 5 percent or more by weight of one or more aromatic or modified aromatic substances:
3824.90.28	Other

The ENs to heading 23.09, HTSUS, state, in pertinent part, as follows:

This heading covers sweetened forage and prepared animal feeding stuffs consisting of a mixture of several nutrients designed :

- (1) to provide the animal with a rational and balanced daily diet (**complete feed**);
- (2) to achieve a suitable daily diet by supplementing the basic farm-produced feed with organic or inorganic substances (**supplementary feed**); or
- (3) for use in making complete or supplementary feeds.

HQ 964600, dated June 21, 2001, relied on the EN above, requiring a prepared animal feeding product to consist of "a mixture of nutrients" for inclusion in heading 2309, HTSUS. Following the reasoning in HQ 964600, NY I83524 failed to classify the instant product as a preparation for use in animal feeding because it contained but one active ingredient, which, if imported without coating, is classified in Chapter 29. The other ingredients simply coat the active ingredient for better digestion in bovines. NY I83524 concluded that this type of coated single ingredient added to a premix was not the type of "preparation" the heading and ENs contemplated for inclusion because the ENs specifically describe preparations as those containing "a mixture of several nutrients."

We find that NY I83524 ignores the fact that the methionine, calcium long chain fatty acids and lauric acid in the instant merchandise each constitute a nutritive ingredient. Our research indicates that calcium salts of long chain fatty acids are a rumen inert fat supplement that helps provide the required energy for increased milk production, better body condition and reproductive efficiency. Lauric acid is a medium chain fatty acid that converts to monolaurin in the body, an antiviral, antibacterial and antiprotazoal monoglyceride that destroys lipid-coated cells such as herpes, cytomegalovirus, influenza, listeria monocytogenes and giardia lanblia. Monolaurin also effects insulin secretion and can induce a proliferation of T-cells. As such, methionine, calcium salts of long chain fatty acids and lauric acid are all nutrients. Hence, Met-Plus is a mixture of several nutrients. Therefore, it is classified in subheading 2309.90.95, HTSUS, the provision for "[p]reparations of a kind used in animal feeding: [o]ther: [o]ther: [o]ther: [o]ther: [o]ther."

HOLDING:

At GRI 1, Met-Plus is classified in subheading 2309.90.95, HTSUS, the provision for "[p]reparations of a kind used in animal feeding: [o]ther: [o]ther: [o]ther: [o]ther: [o]ther."

EFFECT ON OTHER RULINGS:

NY I83524 is REVOKED.

MYLES B. HARMON,
Director,
Commercial Rulings Division.

19 CFR PART 177

**PROPOSED REVOCATION AND MODIFICATION OF RULING
LETTERS AND REVOCATION OF TREATMENT RELATING TO
THE TARIFF CLASSIFICATION OF DIGITAL CAMERAS**

AGENCY: U.S. Customs and Border Protection, Department of Homeland Security.

ACTION: Notice of proposed revocation and modification of ruling letters and revocation of treatment relating to the tariff classification of digital cameras.

SUMMARY: Pursuant to section 625(c), Tariff Act of 1930, as amended, (19 U.S.C. 1625(c)), as amended by section 623 of Title VI (Customs Modernization) of the North American Free Trade Agreement Implementation Act (Pub. L. 103-182, 107 Stat. 2057), this notice advises interested parties that Customs is proposing to revoke two rulings and proposing to modify one ruling pertaining to the tariff classification of digital cameras under the Harmonized Tariff Schedule of the United States ("HTSUS"). Similarly, Customs is proposing to revoke any treatment previously accorded by Customs to substantially identical transactions. Customs invites comments on the correctness of the proposed action.

DATE: Comments must be received on or before August 25, 2003.

ADDRESS: Written comments are to be addressed to the U.S. Bureau of Customs and Border Protection, Office of Regulations & Rulings, Attention: Regulations Branch, 1300 Pennsylvania Avenue N.W., Washington, D.C. 20229. Submitted comments may be inspected at the offices of U.S. Customs and Border Protection, 799 9th Street, NW, Washington, D.C. during regular business hours. Arrangements to inspect submitted comments should be made in advance by calling Mr. Joseph Clark at (202) 572-8768.

FOR FURTHER INFORMATION CONTACT: Deborah Stern, General Classification Branch (202) 572-8785.

SUPPLEMENTARY INFORMATION:

BACKGROUND

On December 8, 1993, Title VI, (Customs Modernization), of the North American Free Trade Agreement Implementation Act (Pub. L. 103-182, 107 Stat. 2057), (hereinafter "Title VI"), became effective. Title VI amended many sections of the Tariff Act of 1930, as amended, and related laws. Two new concepts which emerge from the law are **informed compliance** and **shared responsibility**. These concepts are premised on the idea that in order to maximize voluntary compliance with Customs laws and regulations, the trade community needs to be clearly and completely informed of its legal obligations. Accordingly, the law imposes a greater obligation on Customs to provide the public with improved information concerning the trade community's responsibilities and rights under the Customs and related laws. In addition, both the trade and Customs share responsibility in carrying out import requirements. For example, under section 484 of the Tariff Act of 1930, as amended (19 U.S.C. 1484), the importer of record is responsible for using reasonable care to enter, classify and value imported merchandise, and provide any other information necessary to enable Customs to properly assess

duties, collect accurate statistics and determine whether any other applicable legal requirement is met.

Pursuant to section 625(c)(1), Tariff Act of 1930, as amended (19 U.S.C. 1625(c)(1)), this notice advises interested parties that Customs intends to revoke two ruling letters and modify one ruling letter pertaining to the tariff classification of digital cameras. Although in this notice Customs is specifically referring to three rulings (NY I84955, NY I84563 and NY I86730) this notice covers any rulings on this merchandise which may exist but have not been specifically identified. Customs has undertaken reasonable efforts to search existing databases for rulings in addition to the three identified. No additional rulings have been found. Any party who has received an interpretive ruling or decision (i.e., ruling letter, internal advice memorandum or decision or protest review decision) on the merchandise subject to this notice should advise Customs during this notice period.

Similarly, pursuant to section 625(c)(2), Tariff Act of 1930, as amended (19 U.S.C. 1625(c)(2)), Customs intends to revoke any treatment previously accorded by Customs to substantially identical transactions. This treatment may, among other reasons, be the result of the importer's reliance on a ruling issued to a third party, Customs personnel applying a ruling of a third party to importations of the same or similar merchandise, or to the importer's or Customs' previous interpretation of the Harmonized Tariff Schedule of the United States. Any person involved in substantially identical transactions should advise Customs during this notice period. An importer's failure to advise Customs of substantially identical transactions or of a specific ruling not identified in this notice may raise issues of reasonable care on the part of the importer or its agents for importations of merchandise subsequent to the effective date of the final notice of the proposed action.

In NY I84955, dated August 22, 2002 (Attachment A), NY I84563, dated July 22, 2002 (Attachment B), and NY I86730, dated October 22, 2002 (Attachment C), Customs classified three multifunctional digital cameras in subheading 8525.40.80, HTSUS, which provides, in pertinent part, for "still image video cameras and other video camera recorders; digital cameras: other." These three types of digital cameras performed functions that were provided for in more than one subheading under heading 8525, HTSUS. Thus, Section XVI, Note 3, HTSUS, was applied through General Rule of Interpretation (GRI) 6, directing classification by that subheading which provided for the cameras' principal function.

Where no principal function can be determined, the Harmonized Commodity Description and Coding System Explanatory Notes (ENs) regarding Section XVI, Note 3, provide for GRI 3(c) to be applied. According to GRI 3(c), the provision occurring last in numerical order of those that merit equal consideration provides the classi-

fication. In NY I84955, NY I86730 and NY I84563, Customs resorted to GRI 3(c) at the eight-digit subheading level, considering subheading 8525.40.80, HTSUS, which occurs last in numerical order.

It is now Customs position that GRI 3(c), applied through Section XVI, Note 3, HTSUS, and GRI 6, should not have been applied at the eight-digit level but at the six-digit level, thereby classifying the good under subheading 8525.40, HTSUS. Further, at the eight-digit level subheading 8525.40.80, HTSUS, should not have been considered. The 2002 amendment to the legal text of heading 8525, HTSUS, and subheading 8525.40, HTSUS, adding the term "digital cameras" did not change the scope of the heading or subheading. The amendment simply clarified the scope. Given that there was no change in scope at the six-digit level, the scope of subheading 8525.40.40, HTSUS, where digital cameras were previously classified, also did not change. Therefore, these cameras are still classified in subheading 8525.40.40, HTSUS. Classification in subheading 8525.40.80, HTSUS, was incorrect.

The Information Technology Agreement (ITA), which became effective July 1, 1997 by Presidential Proclamation No. 7011 (62 FR 35909, June 30, 1997) offers further guidance on the scope of subheading 8525.40.40, HTSUS. As a result of the ITA, digital cameras of the type at issue have been classified as "digital still image video cameras" of subheading 8525.40.40, HTSUS, because it the language adopted under the ITA to provide for such digital cameras. Accordingly, the instant digital cameras are classified in subheading 8525.40.40, HTSUS, which provides, in pertinent part, for "still image video cameras and other video camera recorders; digital cameras: digital still image video cameras."

Pursuant to 19 U.S.C. 1625(c)(1), Customs intends to revoke NY I84955 and NY I84563, to modify NY I86730, and to revoke any other ruling not specifically identified to reflect the proper classification of the subject merchandise or substantially similar merchandise, pursuant to the analyses set forth in HQ 966072 (Attachment D), HQ 966531 (Attachment E) and HQ 966530 (Attachment F), respectively. Additionally, pursuant to 19 U.S.C. 1625(c)(2), Customs intends to revoke any treatment previously accorded by Customs to substantially identical merchandise. Before taking this action, we will give consideration to any written comments timely received.

Dated: July 2, 2003

GERARD J. O'BRIEN, JR.,
(for Myles B. Harmon, Director,
Commercial Rulings Division).

[Attachments]

[ATTACHMENT A]

DEPARTMENT OF HOMELAND SECURITY.
BUREAU OF CUSTOMS AND BORDER PROTECTION,
NY 184955
August 22, 2002
CLA-2-85-RR:NC:108:184955
CATEGORY: Classification
TARIFF NO: 8525.40.8085

Ms. DEBBIE KASSEBAUM
LAGAN, INC.
2432 West Peoria Avenue Building 9,
Suites 1165 & 1166
Phoenix, Arizona 85029

RE: The tariff classification of a digital camera from Taiwan and China.

DEAR Ms. KASSENBAUM:

In your letter dated August 7, 2002 you requested a tariff classification ruling.

The sample you have submitted is a Chameleon Mega 1.3 megapixel digital camera. This is a digital still camera with 16 MB of internal storage capability. The camera stores up to 120 photos on high resolution and up to 228 photos on good resolution. The camera operates independent of a computer. You state that the camera is also capable of recording 35-90 second video clips and can be used for teleconferencing at a video refresh rate of 10 frames per second. It is packaged for retail sale as a set together a USB cable, CD-ROM software, 2 AAA batteries, a camera case, a tripod, TV cable, quick start guide, users manual, and dell picture Studio information card. It should be noted that this office considers this camera to be a composite good. This is based upon its ability to function as both a television type camera, capturing live images in real time, and as a digital still image camera with storage capability.

Explanatory Note X to GRI 3b provides for the purpose of this rule, the term "goods put up in sets for retail sale" shall be taken to mean goods which:

A. Consist of at least two different articles which are, *prima facie*, classifiable in different headings.

B. Consist of products put up together to meet a specific activity; and

C. Are put up in a manner suitable for sale to users without repackaging (e.g. in boxes or cases or on boards).

All of the aforementioned articles are *prima facie* classifiable in different headings. Together each enables the user to fully operate the digital camera. Based upon the attached packaging it is evident that the configured goods will not be repackaged upon importation. Therefore it is the opinion of this office that the digital camera and accompanying articles do in fact constitute a set in accordance with Explanatory Note X.

In accordance, in part, with GRI 3b ... goods put up in sets for retail sale, which cannot be classified by reference to GRI 3a, shall be classified as if they consisted of the material or component which gives them their essential character.

EN VIII to GRI 3b states that the factor, which determines essential character, will vary as between different kinds of goods. It may for example, be determined by the nature of the material or component, its bulk, quantity, weight or value, or by the role of the constituent material in relation to the goods.

It is the opinion of this office that the item which imparts the essential character to this particular set is that of the digital camera. It is clearly the reason why one would buy the set and it clearly dominates the set in terms of value and function.

It should be noted that this office considers this camera to be a composite good. This is based upon its ability to function as both a television type camera, capturing live images in real time, and as a digital still image camera with storage capability.

Note 3 to section XVI of the Harmonized Tariff Schedule of the United States (HTS) provides, in pertinent part, that unless the context requires otherwise, machines adapted for the purpose of performing two or more complimentary or alternative functions are to be classified as if consisting only of that component or as being that machine which performs the principal function. It is the opinion of this office that based

upon the dual functionality of this digital camera neither demonstrates a principal function. Therefore classification of the Chamelon Mega 1.3 megapixel digital camera will be in accordance with GRI 3c, Harmonized Tariff Schedule of the United States, which requires, in part that the item be classified in the heading which occurs last in numerical order among those which merit equal consideration.

The applicable subheading for the Chameleon Mega 1.3 megapixel digital camera set will be 8525.40.8085, Harmonized Tariff Schedule of the United States (HTS), which provides for Transmission apparatus for radiotelephony, radiotelegraphy, radiobroadcasting or television, whether or not incorporating reception apparatus or sound recording or reproducing apparatus; television cameras; still image video cameras or other video camera recorders: Still image video cameras and other video camera recorders; Other * * * Other. The rate of duty will be 2.1 percent *ad valorem*.

Legal Note 6 of Chapter 85 will not be applied to the CD-ROM software program. The CD-ROM software program (recorded media) will be classified in accordance with Section XVI, Chapter 85, General Note B1 because the recorded media is presented with apparatus for which it is not-intended.

This ruling is being issued under the provisions of Part 177 of the Customs Regulations (19C.F.R. 177).

A copy of the ruling or the control number indicated above should be provided with the entry documents filed at the time this merchandise is imported. If you have any questions regarding the ruling, contact National Import Specialist Michael Contino at 646-733-3014.

ROBERT B. SWIERUPSKI,
Director,
National Commodity Specialist Division.

[ATTACHMENT B]

DEPARTMENT OF HOMELAND SECURITY,
BUREAU OF CUSTOMS AND BORDER PROTECTION,
NY 184563
August 2, 2002
CLA-2-85:RR:NC:1:108 184563
CATEGORY: Classification
TARIFF NO.: 8525.40.8085

Ms. VALERIE M. SUCHOR
SPECTRA MERCHANDISING INTERNATIONAL, INC.
4230 North Normandy Avenue
Chicago, Illinois 60634

RE: The tariff classification of a digital camera from China.

DEAR Ms. SUCHOR:

In your letter dated July 22, 2002 you requested a tariff classification ruling.

The item in question is a digital camera. It is denoted as the Polaroid PDC 301 Web camera. This particular digital camera is packaged for retail sale, in a blister pack, with CD-ROM software, a user guide, a warranty card and a plastic clip used to attach the camera to a portable PC notebook.

Explanatory Note X to GRI 3b provides for the purpose of this rule, the term "goods put up in sets for retail sale" shall be taken to mean goods which:

A. Consist of at least two different articles which are, *prima facie*, classifiable in different headings.

B. Consist of products put up together to meet a specific activity; and

C. Are put up in a manner suitable for sale to users without repackaging (e.g. in boxes or cases or on boards).

All of the aforementioned articles are *prima facie* classifiable in different headings. Together each enables the user to fully operate the digital camera. Based upon the at-

tached packaging it is evident that the configured goods will not be repackaged upon importation. Therefore it is the opinion of this office that the digital camera and accompanying articles do in fact constitute a set in accordance with Explanatory Note X.

In accordance, in part, with GRI 3b * * * goods put up in sets for retail sale, which cannot be classified by reference to GRI 3a, shall be classified as if they consisted of the material or component which gives them their essential character.

EN VIII to GRI 3b states that the factor, which determines essential character, will vary as between different kinds of goods. It may for example, be determined by the nature of the material or component, its bulk, quantity, weight or value, or by the role of the constituent material in relation to the goods.

It is the opinion of this office that the item which imparts the essential character to this particular set is that of the digital camera. It is clearly the reason why one would buy the set and it clearly dominates the set in terms of value and function.

The Polaroid PDC 301 Digital Camera performs two distinct functions. It can function as a digital still image camera allowing the user to store still images, download and send them via the Internet. It can also serve as a web cam whereby it allows the user to conduct live action video conferencing with a receiving party.

Note 3 to section XVI of the Harmonized Tariff Schedule of the United States (HTS) provides, in pertinent part, that unless the context requires otherwise, machines adapted for the purpose of performing two or more complimentary or alternative functions are to be classified as if consisting only of that component or as being that machine which performs the principal function. It is the opinion of this office that based upon the dual functionality of this digital camera neither demonstrates a principal function. Therefore classification of the Polaroid PDC 301 Digital Camera will be in accordance with GRI 3c, Harmonized Tariff Schedule of the United States, which requires, in part that the item be classified in the heading which occurs last in numerical order among those which merit equal consideration.

Legal Note 6 of Chapter 85 will not be applied to the CD-ROM software program. The CD-ROM software program (recorded media) will be classified in accordance with Section XVI, Chapter 85, General Note B1 because the recorded media is presented with apparatus for which it is not-intended.

The applicable subheading for the Polaroid Digital Camera, model PDC 301 will be 8525.40.8085, Harmonized Tariff Schedule of the United States (HTS), which provides for * * * Still image video cameras and other video camera recorders; digital cameras: Other * * * Other. The rate of duty will be 2.1 percent *ad valorem*.

This ruling is being issued under the provisions of Part 177 of the Customs Regulations (19 C.F.R. 177).

A copy of the ruling or the control number indicated above should be provided with the entry documents filed at the time this merchandise is imported. If you have any questions regarding the ruling, contact National Import Specialist Michael Contino at 646-733-3014.

ROBERT B. SWIERUPSKI,
Director,
National Commodity Specialist Division.

[ATTACHMENT C]

DEPARTMENT OF HOMELAND SECURITY,
BUREAU OF CUSTOMS AND BORDER PROTECTION,

NY 186730

October 22, 2002

CLA-2-85:RR:NC:1:108 186730

CATEGORY: Classification

TARIFF NO.: 8525.40.4000, 8525.40.8085

MS. VALERIE M. SUCHOR
SPECTRA MERCHANDISING INTERNATIONAL, INC.
4230 North Normandy Avenue
Chicago, Illinois 60634

RE: The tariff classification of digital cameras from China.

DEAR MS. SUCHOR:

In your letter dated September 25, 2002 you requested a tariff classification ruling.

The items in question are three types of digital cameras that are packaged for sale at the retail level. They are denoted as the Cool iCam CIC-50A model, the Cool iCam CIC-80A model and the Cool iCam CIC-175A model. Samples of each model, their package contents and descriptive literature of the proposed retail packaging have been furnished to this office. It is indicated that the various models are to be imported for retail sale in their immediate packaging. This office will base this ruling on those specific facts as indicated in the inquiry.

The CIC-50A model is packaged with a USB cable, a camera stand, batteries and a CD-ROM software package. The CIC-80A model is packaged with a USB cable, a camera stand, a non-textile wrist strap, batteries and a CD-ROM software package. The CIC-175A model is packaged with a USB cable, a non-textile pouch, non-textile neck and wrist straps, batteries and a CD-ROM software package.

Explanatory Note X to GRI 3b provides for the purpose of this rule, the term "goods put up in sets for retail sale" shall be taken to mean goods which:

Consist of at least two different articles, which are, *prima facie*, classifiable in different headings.

B. Consist of products put up together to meet a specific activity; and

C. Are put up in a manner suitable for sale to users without repackaging (e.g. in boxes or cases or on boards).

In the case of all three specific models of digital cameras, their respective configurations are made up of articles, which are *prima facie* classified, in different headings. Together each model configuration is designed to enable the user to take digital pictures, store them and transmit them via the Internet. Based upon the information provided there is no evidence that these particular model configurations will be repackaged after importation into the commerce of the United States. It is therefore the opinion of this office that each particular model configuration of the iCam digital cameras constitutes a set in accordance with Explanatory Note X.

In accordance, in part, with GRI 3b *** goods put up in sets for retail sale, which cannot be classified by reference to GRI 3a, shall be classified as if they consisted of the material or component which gives them their essential character.

EN VIII to GRI 3b states that the factor, which determines essential character, will vary as between different kinds of goods. It may for example, be determined by the nature of the material or component, its bulk, quantity, weight or value, or by the role of a constituent material in relation to the goods.

It is the opinion of this office that the item which imparts the essential character to iCam digital camera set is the digital camera. It is clearly the most valuable of the items and is the dominant constituent item by use. It is clearly the reason why one would purchase the individual set.

Note 3 to Section XVI of the Harmonized Tariff Schedule of the United States (HTS) provides, in pertinent part, that unless the context requires otherwise, machines adapted for the purpose of performing two or more complimentary or alternative functions are to be classified as if consisting only of that component or as being that ma-

chine which performs the principal function.

It should be noted that this office considers each particular model of digital camera to be a composite good.

The iCam CIC-50A and iCam CIC-80A each combine Web-Cam capability, that of capturing live images in real time, with that of digital still image production with storage. The iCam CIC-175A combines Web-Cam, digital still image with storage and video clip capability all in one unit. Based upon the multi-functional capability of each particular model this office is of the opinion that no single function for each camera imparts a principal function. Therefore classification of each will be in accordance with GRI 3c, Harmonized Tariff Schedule of the United States which requires, in part, that the item be classified in the heading which occurs last in numerical order among those which merit equal consideration.

The applicable subheading for the iCam CIC-50A and iCam CIC-80A model sets will be 8525.40.4000, Harmonized Tariff Schedule of the United States (HTS), which provides for Transmission apparatus for radiotelephony, radiotelegraphy, radiobroadcasting or television, whether or not incorporating reception apparatus or sound recording or reproducing apparatus; television cameras; still image video cameras or other video camera recorders; digital cameras: Still image video cameras and other video camera recorders; digital cameras: Digital still image cameras. The rate of duty will be free.

The applicable subheading for the iCam CIC-175A model set will be 8525.40.8085, Harmonized Tariff Schedule of the United States (HTS), which provides for Transmission apparatus for radiotelephony, radiotelegraphy, radiobroadcasting or television, whether or not incorporating reception apparatus or sound recording or reproducing apparatus; television cameras; still image video cameras or other video camera recorders; digital cameras: Other * * * Other. The rate of duty will be 2.1 percent *ad valorem*.

Legal Note 6 to chapter 85 requires, in part, that records, tapes and other media of heading 8523 or 8524 remain classified in those headings when entered with the apparatus for which they are intended. For the purpose of this note, the term "apparatus for which they are intended" refers to apparatus which reads or plays the media or which records or writes on the media. The functioning of each iCam camera demonstrates that they do not qualify as "intended" apparatus for the purpose of the CD-ROM software package. Therefore each camera would be considered a "non-intended" apparatus. Therefore legal Note 6 does not apply to the CD-ROM software contained in each set and they do not have to be classified in the specific heading. The CD-ROM software package will be classified in accordance with Section XVI Chapter 85 General Note B (1), Harmonized Tariff Schedule of the United States.

This ruling is being issued under the provisions of Part 177 of the Customs Regulations (19 C.F.R. 177).

A copy of the ruling or the control number indicated above should be provided with the entry documents filed at the time this merchandise is imported. If you have any questions regarding the ruling, contact National Import Specialist Michael Contino at 646-733-3014.

ROBERT B. SWIERUPSKI,

Director,

National Commodity Specialist Division.

[ATTACHMENT D]

DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION,
HQ 966072
CLA-2 RR:CR:GC 966072 BJB/DBS
CATEGORY: Classification
TARIFF NO.: 8525.40.40

Ms. DEBBIE KASSEBAUM
LARGAN INC.
2432 West Peoria Avenue, Building 9
Phoenix, AZ 85029

RE: Revocation of NY I84955; Digital cameras

DEAR MS. KASSEBAUM:

This is in reply to your request of November 21, 2002, for reconsideration of New York Ruling Letter (NY) I84955, issued to Largan Inc., on August 22, 2002, concerning the classification of a multi-functional digital camera and accompanying goods under the Harmonized Tariff Schedule of the United States (HTSUS). In NY I84955, Customs classified the "Largan Chameleon Mega Camera" in subheading 8525.40.80, HTSUS, which provides for other still image video cameras, video camera recorders and digital cameras. We have reviewed NY I84955 and have determined the ruling to be incorrect for the reasons set forth below. A sample was submitted. We regret the delay in responding.

In your request for reconsideration, you cited several rulings which appear to be inconsistent. We have reviewed those rulings and have determined that NY I84563, dated August 2, 2002, is incorrect, and NY I86730, dated October 22, 2002, is, in part, incorrect. The reconsideration of these rulings will be addressed in HQ 966531 and HQ 966530, respectively.

FACTS:

You describe the subject digital camera as the "Largan Chameleon Mega 1.3 Megapixel Digital Camera." In NY I84955, the digital camera was described as a composite good with multiple functions. Largan Inc.'s website, descriptive materials, and packaging state that the camera is a "4-in-1 camera," with digital still image, video, TV, and PC camera functions.

The basic components in the camera, all of which are incorporated into a rectangular housing (approximately 3.48 inches x 2.26 inches x 0.81 inches), are as follows: a CCD (charged-coupled device) image sensor, 16 MB internal flash memory, a fixed-focus lens, a data-conversion device for converting analog data from the CCD into digital data format for transmission by the Universal Serial Bus (USB) cable, USB and TV connector, optical viewfinder, LCD (liquid crystal display) function menu, synchronized flash, tripod mount, and battery compartment.

This digital camera captures live images in real time (i.e., for videoconferencing) with audio capacity and records digital still images and images in sequential order at 15 frames per second (fps) from 35-90 seconds (i.e., video clips) without audio. It operates independently of a computer, recording approximately 120 photos on 1280 x 1024 (high) resolution, or 228 photos on 640 x 480 VGA mode (low) resolution which can be stored in the camera's internal flash memory. When connected to a television, it can capture television-generated still images and sequential images.

The camera's LCD displays only the function menu. The LCD menu provides the following functions: a) delete stored photos individually, or all at once; b) high/low resolution control; c) photo counter; d) photos remaining; e) flash status; f) video recording; g) battery power; h) NTSC/PAL-TV system; i) sound/silent control; j) self-timer; and k) continuous snap shot/single snap shot control. The LCD does not provide a view of recorded images or act as a viewfinder. To view recorded images and clips, the digital camera must be connected to an automatic data processing (ADP) machine, such as a personal computer, or to a television.

This digital camera is packaged, imported and advertised for sale together with: 1) 2 AAA 1.5 volt batteries; 2) camera strap; 3) USB cable with connectors; 4) TV cable

with connectors; 5) instruction manual; 6) user's guide; 7) tripod; 8) leatherette camera case; and 9) CD-ROM installation software.

You claim that the digital camera is classifiable in subheading 8525.30.90, HTSUS, which provides for television cameras, or in the alternative, in subheading 8525.40.40, HTSUS, which provides for digital still image video cameras.

ISSUES:

1) Whether digital cameras are within the scope of the term "digital still image video cameras" of subheading 8525.40.40, HTSUS.

2) Whether the camera and accompanying merchandise are classifiable as "a set put up for retail sale" under the HTSUS.

LAW AND ANALYSIS:

Classification under the HTSUS is made in accordance with the General Rules of Interpretation ("GRIs"). GRI 1 provides that the classification of goods shall be determined according to the terms of the headings of the tariff schedule and any relative Section or Chapter Notes. In the event that the goods cannot be classified solely on the basis of GRI 1, and if the headings and legal notes do not otherwise require, the remaining GRIs may then be applied.

In understanding the language of the HTSUS, the Harmonized Commodity Description and Coding System Explanatory Notes may be utilized. The Explanatory Notes (ENs), although not dispositive or legally binding, provide a commentary on the scope of each heading of the HTSUS, and are generally indicative of the proper interpretation of these headings. Customs believes the ENs should always be consulted. See T.D. 89-80, 54 Fed. Reg. 35127, 35128 (Aug. 23, 1989).

The HTSUS provisions under consideration are as follows:

8525	Transmission apparatus for radiotelephony, radiotelegraphy, radiobroadcasting or television, whether or not incorporating reception apparatus or sound recording or reproducing apparatus; television cameras; still image video cameras and other video camera recorders; digital cameras:
8525.30	Television cameras:
8525.30.90	Other
*	* * * * *
8525.40	Still image video cameras and other video camera recorders; digital cameras:
8525.40.40	Digital still image video cameras
*	* * * * *
8525.40.80	Other

NY 184955, Customs stated that this digital camera is a composite good. A composite good is a good which is *prima facie* classifiable, in part only, in more than one heading. This digital camera is not a composite good, but rather a machine whose functions all fall within the scope of heading 8525, HTSUS. Thus, classification at the heading level is not in dispute. To determine in which subheading this digital camera is classified, we must employ GRI 6, which permits the comparison of same-level subheadings within a heading, in part by application of Rules 1 through 5, applied by the appropriate substitution of terms. Only subheadings at the same level are comparable, so we must first address the 6-digit level.

Subheading 8525.30, HTSUS, in pertinent part, provides for "television cameras." Subheading 8525.40, HTSUS, in pertinent part, provides for "still image video cameras and other video camera recorders; digital cameras." You claim that the digital camera is classifiable at GRI 3(a), applied at the 6-digit level by GRI 6, which requires the good be classified according to the most specific description. However, we do not reach GRI 3. According to GRI 1, applied through GRI 6, we must first look to the relevant section and chapter notes.

Section XVI, Note 3, provides:

"Unless the context otherwise requires, composite machines consisting of two or more machines fitted together to form a whole and other machines designed for the purpose of performing two or more complementary or alternative functions are to be classified as if consisting only of that component or as being that machine which performs the principal function." (2003) [Emphasis added.]

EN 85.25, section (C), describes television cameras as including, for example, "television cameras for television studios or for reporting, those used for industrial or scientific purposes or for supervising traffic." Customs has classified PC cameras, which are those designed to be connected to ADP machines, used for videoconferencing, and for the capture of still images and moving images that do not contain internal or removable storage media as television cameras of subheading 8525.30.90, HTSUS. See e.g., HQ 964973, dated July 17, 2002. PC cameras are designed to transmit video images to an ADP machine for processing or for direct transmission over the Internet, transmitting live image as television cameras do. Therefore, whether this camera transmits real time images directly to a television set, video monitor for surveillance, or to a computer or other device, it performs the function of a category of cameras that fall within the term "television cameras" of subheading 8525.30, HTSUS. See HQ 964973; see also HQ 966172, dated June 4, 2003; HQ 965097, dated July 19, 2002; HQ 958632, dated January 25, 1996; NY A84032, dated May 31, 1996; NY B81818, dated February 13, 1997; NY A81240, dated March 18, 1996; NY F88315, dated June 29, 2000.

The PC videoconferencing function transmits live video images captured by the camera's CCD to an automatic data processing machine (ADP) monitor via a USB cable attached to the USB connector on the camera's left side. This live videoconferencing function is supported by the threaded mount in the digital camera's base and fitted to a tripod for placement on top of an ADP machine's monitor. Therefore, the camera's functions are provided for in part by subheading 8525.30, HTSUS.

In the Information Technology Agreement (ITA), which went into effect on July 1, 1997 by Presidential Proclamation No. 7011 (62 FR 35909, June 30, 1997), the U.S. notified the other signatories that it would classify "digital still image video cameras" in subheading 8525.40.40, HTSUS. The intent of the provision was to provide duty-free treatment to a class of digital cameras which have both prior to and since the ITA been provided for in subheading 8525.40, HTSUS. See, e.g., NY 817941, dated January 14, 1996; HQ 960384, dated April 1, 1999 (classifying Casio QV-10 digital cameras entered in 1995); HQ 960664, dated April 20, 1999 (classifying Olympus Digital Still Camera model # D-200L entered in 1995); NY F86533, dated May 17, 2000; and NY G86928, dated February 9, 2001.

The term "digital cameras" was added to the text of heading 8525, HTSUS, and subheading 8525.40, HTSUS, as a result of the 2002 amendment in the HTSUS, effective January 10, 2002. That amendment was intended to clarify that the provisions included cameras that are commonly and commercially known as "digital cameras." The addition of this term was not intended to change the scope of the heading or subheading level. Generally, digital cameras perform still image capture and limited sequential image capture, but they are not those cameras commonly and commercially known as camcorders.

The legal text to subheading 8525.40, HTSUS, both before and after the 2002 amendment, describes the cameras of the subheading as "recorders." EN 85.25 (3rd Edition, 2002) indicates that the cameras of this category "record images" or "record sequential images." That is, these cameras have the ability to record and store still images or video on permanent or removable media within the camera (e.g., random access memory (RAM), flash memory cards, memory sticks or magnetic tape, as with certain camcorders), such that the images can be retrieved and viewed at a time subsequent to the time they are captured. See HQ 966307, dated June 6, 2003.

In addition to videoconferencing capabilities, the digital camera captures still images and sequential images (up to 90 seconds of video) through a CCD and stores them in the internal flash memory. Though it operates independently from an ADP machine or TV, it must be connected to an ADP machine for viewing and processing,

or to a television set for viewing. In addition, it can capture 16 continuous still frames from the television as it can receive NTSC signals and record them. The recording of digital images and the ability to view and process them via ADP machine and TV are functions are provided by subheading 8525.40, HTSUS.

As the digital camera performs functions that are covered by subheading 8525.30, HTSUS and 8525.40, HTSUS, it is a multifunctional camera designed for the purpose of performing two or more complementary or alternative functions. As such, it is a composite machine, classified according to the camera's principal function, pursuant to Section XVI, Note 3, HTSUS.

The instant camera contains no feature that predominates over any other feature to suggest that one capability constitutes the principal function. In fact, all of the digital camera's capabilities are advertised equally on the good's packaging and in the owner's manual. As such, we are unable to determine the digital camera's principal function.

General EN (VI) to Section XVI provides that, "[w]here it is not possible to determine the principal function, and where as provided in Note 3 to the Section, the context does not otherwise require, it is necessary to apply General Interpretative Rule 3(c) * * *". GRI 3(c) provides that "When goods cannot be classified by reference to 3(a) or 3(b), they shall be classified under the heading which occurs last in numerical order among those which equally merit consideration."

Both subheading 8525.30, HTSUS, and 8525.40, HTSUS, merit equal consideration for the reasons stated above. Thus, the digital camera is classified in subheading 8525.40, HTSUS.

Because the 2002 legal text amendment did not change the scope of subheading 8525.40, we find that the scope of subheading 8525.40.40, HTSUS, which provides for "digital still image video cameras," also did not change. Subheading 8525.40.40, HTSUS, still provides for those articles commonly and commercially referred to as digital cameras. Accordingly, this digital camera is classified in subheading 8525.40.40, HTSUS.

NY I84955 applied GRI 3(c), through Section XVI, Note 3 and GRI 6, to the eight-digit subheading level rather than the six-digit level, as discussed above. Further, subheading 8525.40.80, HTSUS, should not have been considered, as the scope of subheading 8525.40.40, HTSUS, has not changed. Therefore, NY I84955 is incorrect.

The other components that are imported with the camera are each described under a different heading. As such, they cannot be classified according to GRI 1. GRI 2(b) provides that "[t]he classification of goods consisting of more than one material or substance shall be according to the principles of Rule 3."

GRI 3 provides, "when, by application of Rule 2(b) or for any other reason, goods are, *prima facie*, classifiable under two or more headings, classification shall be effected as follows:

- (a) The heading which provides the most specific description shall be preferred to headings providing a more general description. However, when two or more headings each refer to part only of the materials or substances contained in mixed or composite goods or to part only of the items in a set put up for retail sale, those headings are to be regarded as equally specific in relation to those goods, even if one of them gives a more complete or precise description of the goods.

Insofar as two or more headings each refer to part only of these goods GRI 3(a) does not apply. However, GRI 3(b) provides, in pertinent part:

- * * * goods put up in sets for retail sale, which cannot be classified by reference to 3(a), shall be classified as if they consisted of the material or component which gives them their essential character, insofar as this criterion is applicable.

The EN to GRI 3(b) indicates that to meet the criteria of a set put up together for retail sale, "articles must:

- (a) consist of at least two different articles, which are, *prima facie*, classifiable in different headings;

- (b) consist of products or articles put up together to meet a particular need or carry out a specific activity; and
- (c) are put up in a manner suitable for sale directly to users without repacking (e.g., in boxes or cases or on boards)."

All of the articles are *prima facie* classifiable in different headings (leatherette case - 4202; plastic tripod/stand - 3926; user's guide and instruction manual - 4901; batteries - 8506; CD-ROM - 8524; USB and TV cables - 8544; camera strap - 6307). They all contribute to the use of the functions of the digital camera, including videoconferencing and capturing, recording, viewing, editing and processing digital images. The digital camera is imported and packaged together for direct sale with the above-listed articles. This is confirmed by information from Largan Inc.'s Internet website, the camera's packaging, instruction manual, and user's guide.

Under these facts, the subject goods meet all three criteria of the GRI 3(b) EN, and therefore, form a set put up for retail sale. Thus, the goods are to be classified according to the component that imparts the "essential character" of the set. EN VIII to GRI 3(b) provides that the characteristic which gives a set its "essential character" may, for example, be determined by the nature of the material or component, its bulk, quantity, weight or value or by the role of a constituent material in relation to the use of the goods.

It is clear that the digital camera is the most important article in the set. The digital camera is the most valuable article in terms of marketability, for the importer, and in terms of utility, for the consumer. As such, we conclude that the digital camera imparts the "essential character" of the set.

Chapter 85, Legal Note 6, HTSUS, provides that, "[r]ecords, tapes, and other media of heading 8523 or 8524 remain classified in those headings when entered with the apparatus for which they are intended." However, the note "does not apply to such media when they are entered with articles other than the apparatus for which they are intended." The CD-ROM installation software is used in an ADP machine, not in the camera. However, it is part of this digital camera set. General EN (B)(1) to Chapter 85, HTSUS, directs that if recorded media presented with apparatus for which it is not intended is part of a set for retail sale, it is classified pursuant to GRI 3(b). Therefore, the instant CD-ROM need not be classified separately; it is subsumed in the set.

HOLDING:

At GRI 3(b), the Largan 1.3 megapixel digital camera set for retail sale is classified subheading 8525.40.40, HTSUS, which provides for, in pertinent part, "[t]ransmission apparatus for radiotelephony * * * television cameras; still image video cameras and other video camera recorders; digital cameras: Still image video cameras and other video camera recorders; digital cameras: digital still image video cameras."

EFFECT ON OTHER RULINGS:

NY I84955, dated August 22, 2002, is hereby REVOKED.

MYLES B. HARMON,
Director,
Commercial Rulings Division.

[ATTACHMENT E]

DEPARTMENT OF HOMELAND SECURITY,
BUREAU OF CUSTOMS AND BORDER PROTECTION,
HQ 966531
CLA-2 RR:CR:GC 966531 DBS
CATEGORY: Classification
TARIFF NO.: 8525.40.40

MS. VALERIE SUCHOR
SPECTRA MERCHANDISING INTERNATIONAL, INC.
4230 North Normandy Avenue
Chicago, IL 60634

RE: Revocation of NY I84563; Digital cameras

DEAR MS. SUCHOR:

On July 22, 2002, the U.S. Customs and Border Protection National Commodity Specialist Division issued to you New York Ruling (NY) I84563, which classified the Polaroid PDC 301 digital camera under the Harmonized Tariff Schedule of the United States (HTSUS). We have reconsidered that ruling and determined it is incorrect.

FACTS:

The merchandise at issue is a digital camera, the Polaroid PDC 301. This digital camera is packaged for retail sale, in a blister pack, with CD-ROM software, a user guide, a warranty card and a plastic clip used to attach the camera to a portable PC notebook. After determining that the products comprised a "set for retail sale," classifiable by the camera, which imparts the essential character of the set, NY I84563 stated the following:

The Polaroid PDC 301 Digital Camera performs two distinct functions. It can function as a digital still image camera allowing the user to store still images, download and send them via the Internet. It can also serve as a web cam whereby it allows the user to conduct live action video conferencing with a receiving party.

Note 3 to section XVI of the Harmonized Tariff Schedule of the United States (HTS) provides, in pertinent part, that unless the context requires otherwise, machines adapted for the purpose of performing two or more complimentary or alternative functions are to be classified as if consisting only of that component or as being that machine which performs the principal function. It is the opinion of this office that based upon the dual functionality of this digital camera neither demonstrates a principal function. Therefore classification of the Polaroid PDC 301 Digital Camera will be in accordance with GRI 3c, Harmonized Tariff Schedule of the United States, which requires, in part that the item be classified in the heading which occurs last in numerical order among those which merit equal consideration.

NY I84563 classified the camera in subheading 8525.40.80, HTSUS, which provides for other still image video cameras and other video recorders; digital cameras.

ISSUE:

What is the classification under the HTSUS of the instant multifunctional digital camera?

LAW AND ANALYSIS:

Classification under the HTSUS is made in accordance with the General Rules of Interpretation ("GRIs"). GRI 1 provides that the classification of goods shall be determined according to the terms of the headings of the tariff schedule and any relative Section or Chapter Notes. In the event that the goods cannot be classified solely on the basis of GRI 1, and if the headings and legal notes do not otherwise require, the remaining GRIs may then be applied.

In understanding the language of the HTSUS, the Harmonized Commodity Description and Coding System Explanatory Notes may be utilized. The Explanatory Notes (ENs), although not dispositive or legally binding, provide a commentary on the scope

of each heading of the HTSUS, and are generally indicative of the proper interpretation of these headings. Customs believes the ENs should always be consulted. See T.D. 89-80, 54 Fed. Reg. 35127, 35128 (Aug. 23, 1989).

The HTSUS provisions under consideration are as follows:

8526	Transmission apparatus for radiotelephony, radiotelegraphy, radiobroadcasting or television, whether or not incorporating reception apparatus or sound recording or reproducing apparatus; television cameras; still image video cameras and other video camera recorders; digital cameras:
8526.30	Television cameras:
*	* * * * *
8525.41	Still image video cameras and other video camera recorders; digital cameras:
8525.40.41	Digital still image video cameras
*	* * * * *
8525.40.80	Other

As stated in NY I84563, the Polaroid PDC 301 performs two distinct functions. The digital camera captures and stores still images, which can then be processed by an automatic data processing (ADP) machine. The camera also captures live images in real time (i.e., for videoconferencing). Both of these functions fall within the scope of heading 8525, HTSUS. Thus, classification at the heading level is not in dispute.

To determine in which subheading this digital camera is classified, we must employ GRI 6, which permits the comparison of same-level subheadings within a heading, in part by application of Rules 1 through 5, applied by the appropriate substitution of terms. Only subheadings at the same level are comparable, so we must first address the 6-digit level.

Subheading 8525.30, HTSUS, in pertinent part, provides for "television cameras." Subheading 8525.40, HTSUS, in pertinent part, provides for "still image video cameras and other video camera recorders; digital cameras." According to GRI 1, applied through GRI 6, we must first look to the relevant section and chapter notes.

Section XVI, Note 3, provides:

"Unless the context otherwise requires, composite machines consisting of two or more machines fitted together to form a whole and **other machines designed for the purpose of performing two or more complementary or alternative functions are to be classified as if consisting only of that component or as being that machine which performs the principal function.**" (2003) [Emphasis added.]

EN 85.25, section (C), p. 1668 (3rd Edition, 2002), describes television cameras as including, for example, "television cameras for television studios or for reporting, those used for industrial or scientific purposes or for supervising traffic." Customs has classified PC cameras, which are those designed to be connected to ADP machines, used for videoconferencing, and for the capture of still images and moving images that do not contain internal or removable storage media as television cameras of subheading 8525.30.90, HTSUS. See e.g., HQ 964973, dated July 17, 2002. PC cameras are designed to transmit video images to an ADP machine for processing or for direct transmission over the Internet, transmitting live image as television cameras do. Therefore, whether this camera transmits real time images directly to a television set, video monitor for surveillance, or to a computer or other device, it performs the function of a category of cameras that fall within the term "television cameras" of subheading 8525.30, HTSUS. See HQ 964973; see also HQ 966172, dated June 4, 2003; HQ 965097, dated July 19, 2002; HQ 958632, dated January 25, 1996; NY A84032, dated May 31, 1996; NY B81818, dated February 13, 1997; NY A81240, dated March 18, 1996; NY F88315, dated June 29, 2000.

The PC videoconferencing function transmits live video images captured by the camera to an ADP monitor via a USB cable. Therefore, the camera's functions are provided for in part by subheading 8525.30, HTSUS.

In the Information Technology Agreement (ITA), which went into effect on July 1, 1997, by Presidential Proclamation No. 7011 (62 FR 35909, June 30, 1997), the U.S. notified the other signatories that it would classify "digital still image video cameras" in subheading 8525.40.40, HTSUS. The intent of the provision was to provide duty free treatment to a class of digital cameras which have both prior to and since the ITA been provided for in subheading 8525.40, HTSUS. *See, e.g.*, NY 817941, dated January 14, 1996; HQ 960384, dated April 1, 1999 (classifying Casio QV-10 digital cameras entered in 1995); HQ 960664, dated April 20, 1999 (classifying Olympus Digital Still Camera model # D-200L entered in 1995); NY F86533, dated May 17, 2000; and NY G86928, dated February 9, 2001.

The term "digital cameras" was added to the text of heading 8525, HTSUS, and subheading 8525.40, HTSUS, as a result of the 2002 amendment in the HTSUS, effective January 10, 2002. That amendment was intended to clarify that the provisions included cameras that are commonly and commercially known as "digital cameras." The addition of this term was not intended to change the scope of the heading or subheading level. Generally, digital cameras perform still image capture and limited sequential image capture, but are not those cameras commonly and commercially known as camcorders.

The legal text to subheading 8525.40, HTSUS, both before and after the 2002 amendment, describes the cameras of the subheading as "recorders." EN 85.25 (3rd Edition, 2002) indicates that the cameras of this category "record images" or "record sequential images." That is, these cameras have the ability to record and store still images or video on permanent or removable media within the camera (e.g., random access memory (RAM), flash memory cards, memory sticks or magnetic tape, as with certain camcorders), such that the images can be retrieved and viewed at a time subsequent to the time they are captured. *See* HQ 966307, dated June 6, 2003.

In addition to videoconferencing capabilities, the instant camera captures still images and stores them internally. Though it operates independently from an ADP machine, it must be connected to an ADP machine for processing the recorded digital images. This function is provided for in subheading 8525.40, HTSUS.

As the instant digital camera performs functions that are covered by subheading 8525.30, HTSUS and 8525.40, HTSUS, it is a multifunctional camera designed for the purpose of performing two or more complementary or alternative functions. As such, it is a composite machine, classified according to the camera's principal function, pursuant to Section XVI, Note 3, HTSUS.

General EN (VI) to Section XVI provides that, "[w]here it is not possible to determine the principal function, and where as provided in Note 3 to the Section, the context does not otherwise require, it is necessary to apply General Interpretative Rule 3(c)." GRI 3(c) provides that "When goods cannot be classified by reference to 3(a) or 3(b), they shall be classified under the heading which occurs last in numerical order among those which equally merit consideration."

Subheadings 8525.30, HTSUS, and 8525.40, HTSUS, merit equal consideration for the reasons stated above. Thus, the instant digital camera is classified in subheading 8525.40, HTSUS.

Because the 2002 legal text amendment did not change the scope of subheading 8525.40, we find that the scope of subheading 8525.40.40, HTSUS, which provides for "digital still image video cameras," also did not change. Subheading 8525.40.40, HTSUS, still provides for those articles commonly and commercially referred to as digital cameras. Accordingly, the instant digital camera is classified in subheading 8525.40.40, HTSUS.

NY I84563 applied GRI 3(c), through Section XVI, Note 3 and GRI 6, to the eight-digit subheading level rather than the six-digit level, as discussed above. Further, subheading 8525.40.80, HTSUS, should not have been considered, as the scope of subheading 8525.40.40, HTSUS, has not changed. Therefore, NY I84563 is incorrect.

It is noted that NY I84563 was correct in determining that the camera imported in a blister pack with CD-ROM software, a user guide, a warranty card and a plastic clip used to attach the camera to a portable PC notebook comprises a set put up for retail sale, and that the essential character of the set is imparted by the camera. Further, the application of Note 6 to Chapter 85, HTSUS, regarding classification of software, was also correct. Therefore, the set, including the CD-ROM, is classified as if consisting only of that article which imparts the essential character of the set: the digital camera.

HOLDING:

At GRI 3(b), the Polaroid PDC 301 digital camera set is classified subheading 8525.40.40, HTSUS, which provides for, in pertinent part, "[t]ransmission apparatus for radiotelephony * * * television cameras; still image video cameras and other video camera recorders; digital cameras: Still image video cameras and other video camera recorders; digital cameras: digital still image video cameras."

EFFECT ON OTHER RULINGS:

NY I84563, dated July 22, 2002, is hereby REVOKED.

MYLES B. HARMON,
Director,
Commercial Rulings Division.

[ATTACHMENT F]

DEPARTMENT OF HOMELAND SECURITY.
BUREAU OF CUSTOMS AND BORDER PROTECTION,
HQ 966530
CLA-2 RR:CR:GC 966530 DBS
CATEGORY: Classification
TARIFF NO.: 8525.40.40

Ms. VALERIE SUCHOR
SPECTRA MERCHANDISING INTERNATIONAL, INC.
4230 North Normandy Avenue
Chicago, IL 60634

RE: Modification of NY I86730; Digital cameras

DEAR Ms. SUCHOR:

On October 22, 2002, the U.S. Customs and Border Protection National Commodity Specialist Division issued to you New York Ruling (NY) I86730, which classified three types of digital cameras, the Cool iCam models CIC-50A, CIC-80A and CIC-175A, under the Harmonized Tariff Schedule of the United States (HTSUS). We have reconsidered that ruling and determined that the classification of the Cool iCam CIC-175A is incorrect. Therefore, we are proposing to modify NY I86730 to reflect the proper classification of that model.

FACTS:

The Cool iCam model CIC-175A ("CIC-175A") is a multi-functional digital camera. It functions as a personal computer video camera (PC camera or Web-Cam), which is used for videoconferencing when connected to an automatic data processing (ADP) machine. The camera also digitally captures and records still images and sequential images (video clips). The CIC-175A model is packaged for direct sale with a Universal Serial Bus (USB) cable, a non-textile pouch, non-textile neck and wrist straps, batteries and a CD-ROM software package. In NY I86730 we stated that, based on the multi-functional capability of the camera, no single function for each camera imparts a principal function, and as such the classification of each will be in accordance with General Rule of Interpretation 3(c), HTSUS, which requires that the item be classified in the heading which occurs last in numerical order among those which merit

equal consideration. The CIC-175A was thus classified in subheading 8525.40.80, HTSUS, which provides for other still image video cameras and other video recorders; digital cameras.

ISSUE:

What is the classification under the HTSUS of the instant multifunctional digital camera?

LAW AND ANALYSIS:

Classification under the HTSUS is made in accordance with the General Rules of Interpretation ("GRIs"). GRI 1 provides that the classification of goods shall be determined according to the terms of the headings of the tariff schedule and any relative Section or Chapter Notes. In the event that the goods cannot be classified solely on the basis of GRI 1, and if the headings and legal notes do not otherwise require, the remaining GRIs may then be applied.

In understanding the language of the HTSUS, the Harmonized Commodity Description and Coding System Explanatory Notes may be utilized. The Explanatory Notes (ENs), although not dispositive or legally binding, provide a commentary on the scope of each heading of the HTSUS, and are generally indicative of the proper interpretation of these headings. Customs believes the ENs should always be consulted. *See* T.D. 89-80, 54 Fed. Reg. 35127, 35128 (Aug. 23, 1989).

The HTSUS provisions under consideration are as follows:

8527	Transmission apparatus for radiotelephony, radiotelegraphy, radiobroadcasting or television, whether or not incorporating reception apparatus or sound recording or reproducing apparatus; television cameras; still image video cameras and other video camera recorders; digital cameras;
8527.30	Television cameras;
*	* * * * *
8525.42	Still image video cameras and other video camera recorders; digital cameras;
8525.40.42	Digital still image video cameras
*	* * * * *
8525.40.81	Other

As stated in NY I86730, the CIC-175A performs several functions. The digital camera captures and stores still images and sequential images (video clips), which can then be processed by an ADP machine. The camera also captures live images in real time (i.e., for videoconferencing). These functions fall within the scope of heading 8525, HTSUS. Thus, classification at the heading level is not in dispute.

To determine in which subheading this digital camera is classified, we must employ GRI 6, which permits the comparison of same-level subheadings within a heading, in part by application of Rules 1 through 5, applied by the appropriate substitution of terms. Only subheadings at the same level are comparable, so we must first address the 6-digit level.

Subheading 8525.30, HTSUS, in pertinent part, provides for "television cameras." Subheading 8525.40, HTSUS, in pertinent part, provides for "still image video cameras and other video camera recorders; digital cameras." According to GRI 1, applied through GRI 6, we must first look to the relevant section and chapter notes.

Section XVI, Note 3, provides:

"Unless the context otherwise requires, composite machines consisting of two or more machines fitted together to form a whole and **other machines designed for the purpose of performing two or more complementary or alternative functions are to be classified as if consisting only of that component or**

as being that machine which performs the principal function.” (2003) [Emphasis added.]

EN 85.25, section (C), p. 1668 (3rd Edition, 2002), describes television cameras as including, for example, “television cameras for television studios or for reporting, those used for industrial or scientific purposes or for supervising traffic.” Customs has classified PC cameras, which are those designed to be connected to ADP machines, used for videoconferencing, and for the capture of still images and moving images that do not contain internal or removable storage media as television cameras of subheading 8525.30.90, HTSUS. See e.g., HQ 964973, dated July 17, 2002. PC cameras are designed to transmit video images to an ADP machine for processing or for direct transmission over the Internet, transmitting live image as television cameras do. Therefore, whether this camera transmits real time images directly to a television set, video monitor for surveillance, or to a computer or other device, it performs the function of a category of cameras that fall within the term “television cameras” of subheading 8525.30, HTSUS. See HQ 964973; see also HQ 966172, dated June 4, 2003; HQ 965097, dated July 19, 2002; HQ 958632, dated January 25, 1996; NY A84032, dated May 31, 1996; NY B81818, dated February 13, 1997; NY A81240, dated March 18, 1996; NY F88315, dated June 29, 2000.

The PC videoconferencing function transmits live video images captured by the camera to an ADP monitor via a USB cable. Therefore, the camera's functions are provided for in part by subheading 8525.30, HTSUS.

In the Information Technology Agreement (ITA), which went into effect on July 1, 1997, by Presidential Proclamation No. 7011(62 FR 35909, June 30, 1997), the U.S. notified the other signatories that it would classify “digital still image video cameras” in subheading 8525.40.40, HTSUS. The intent of the provision was to provide duty free treatment to a class of digital cameras which have both prior to and since the ITA been provided for in subheading 8525.40, HTSUS. See, e.g., NY 817941, dated January 14, 1996; HQ 960384, dated April 1, 1999 (classifying Casio QV-10 digital cameras entered in 1995); HQ 960664, dated April 20, 1999 (classifying Olympus Digital Still Camera model # D-200L entered in 1995); NY F86533, dated May 17, 2000; and NY G86928, dated February 9, 2001.

The term “digital cameras” was added to the text of heading 8525, HTSUS, and subheading 8525.40, HTSUS, as a result of the 2002 amendment in the HTSUS, effective January 10, 2002. That amendment was intended to clarify that the provisions included cameras that are commonly and commercially known as “digital cameras.” The addition of this term was not intended to change the scope of the heading or subheading level. Generally, digital cameras perform still image capture and limited sequential image capture, but are not those cameras commonly and commercially known as camcorders.

The legal text to subheading 8525.40, HTSUS, both before and after the 2002 amendment, describes the cameras of the subheading as “recorders.” EN 85.25 (3rd Edition, 2002) indicates that the cameras of this category “record images” or “record sequential images.” That is, these cameras have the ability to record and store still images or video on permanent or removable media within the camera (e.g., random access memory (RAM), flash memory cards, memory sticks or magnetic tape, as with certain camcorders), such that the images can be retrieved and viewed at a time subsequent to the time they are captured. See HQ 966307, dated June 6, 2003.

In addition to videoconferencing capabilities, the instant camera captures still images and limited sequential images and stores them internally. Though it operates independently from an ADP machine, it must be connected to an ADP machine for processing the recorded digital images. These functions are provided for in subheading 8525.40, HTSUS.

As the instant digital camera performs functions that are covered by subheading 8525.30, HTSUS and 8525.40, HTSUS, it is a multifunctional camera designed for the purpose of performing two or more complementary or alternative functions. As such, it is a composite machine, classified according to the camera's principal function, pursuant to Section XVI, Note 3, HTSUS.

General EN (VI) to Section XVI provides that, "[w]here it is not possible to determine the principal function, and where as provided in Note 3 to the Section, the context does not otherwise require, it is necessary to apply General Interpretative Rule 3(c)." GRI 3(c) provides that "When goods cannot be classified by reference to 3(a) or 3(b), they shall be classified under the heading which occurs last in numerical order among those which equally merit consideration."

Subheadings 8525.30, HTSUS, and 8525.40, HTSUS, merit equal consideration for the reasons stated above. Thus, the instant digital camera is classified in subheading 8525.40, HTSUS.

Because the 2002 legal text amendment did not change the scope of subheading 8525.40, we find that the scope of subheading 8525.40.40, HTSUS, which provides for "digital still image video cameras," also did not change. Subheading 8525.40.40, HTSUS, still provides for those articles commonly and commercially referred to as digital cameras. Accordingly, the instant digital camera is classified in subheading 8525.40.40, HTSUS.

NY I86730 applied GRI 3(c), through Section XVI, Note 3 and GRI 6, to the eight-digit subheading level rather than the six-digit level, as discussed above. Further, subheading 8525.40.80, HTSUS, should not have been considered, as the scope of subheading 8525.40.40, HTSUS, has not changed. Therefore, NY I84563 is incorrect.

It is noted that NY I86730 was correct in determining that the camera imported in a blister pack with CD-ROM software, a user guide, a warranty card and a plastic clip used to attach the camera to a portable PC notebook comprises a set put up for retail sale, and that the essential character of the set is imparted by the camera. Further, the application of Note 6 to Chapter 85, HTSUS, regarding classification of software, was also correct. Therefore, the set, including the CD-ROM, is classified as if consisting only of that article which imparts the essential character of the set: the digital camera.

HOLDING:

At GRI 3(b), the Cool iCam model CIC-175A digital camera set is classified in subheading 8525.40.40, HTSUS, which provides for, in pertinent part, "[t]ransmission apparatus for radiotelephony * * * television cameras; still image video cameras and other video camera recorders; digital cameras: Still image video cameras and other video camera recorders; digital cameras: digital still image video cameras."

EFFECT ON OTHER RULINGS:

NY I86730, dated October 22, 2002, is hereby MODIFIED.

MYLES B. HARMON,
Director,
Commercial Rulings Division.

United States Court of International Trade

One Federal Plaza
New York, NY 10278

Chief Judge

Gregory W. Carman

Judges

Jane A. Restani
Thomas J. Aquilino, Jr.
Donald C. Pogue
Evan J. Wallach

Judith M. Barzilay
Delissa A. Ridgway
Richard K. Eaton
Timothy C. Stanceu

Senior Judges

Nicholas Tsoucalas
R. Kenton Musgrave
Richard W. Goldberg

Clerk

Leo M. Gordon

THE HISTORY OF THE CITY OF BOSTON

BY

JOHN

W. L. GARDNER

OF BOSTON

AND

JOHN

W. L. GARDNER

OF BOSTON

AND

JOHN

W. L. GARDNER

OF BOSTON

AND

JOHN

W. L. GARDNER

OF BOSTON

AND

JOHN

W. L. GARDNER

OF BOSTON

AND

JOHN

W. L. GARDNER

OF BOSTON

Decisions of the United States Court of International Trade

(Slip Op. 03-78)

UNITED STATES, PLAINTIFF, *v.* PAN PACIFIC TEXTILE GROUP, INC.,
AVIAT SPORTIF, INC., BUDGET TRANSPORT, INC., PRIME INTERNATIONAL AGENCY, BILLION SALES, EVER POWER CORP., AMERICAN CONTRACTORS INDEMNITY COMPANY, and THOMAS MAN CHUNG TAO, and STEPHEN SHEN YU JUANG, DEFENDANTS.

Court No. 01-01022 P

[Defendants' motion for summary judgment is denied.]

(Dated: July 8, 2003)

Peter D. Keisler, Assistant Attorney General, *David M. Cohen*, Director, *A. David Lafer*, Senior Trial Counsel, Commercial Litigation Branch, Civil Division, United States Department of Justice (*Michael Panzera*); *Joanne M. Halley*, Office of Associate Chief Counsel, Bureau of Customs and Border Protection, United States Department of Homeland Security, for plaintiff United States.

John Weber for defendants Thomas Man Chung Tao, Pan Pacific Textile Group, Inc., and Aviat Sportif, Inc.

OPINION

GOLDBERG, *Senior Judge*: This case involves an action by the United States Customs Service¹ ("Customs") against defendants Pan Pacific Textile Group, Inc., Aviat Sportif, Inc., Budget Transport, Inc., Prime International Agency, Billion Sales, Ever Power Corp., American Contractors Indemnity Company, Thomas Man Chung Tao, and Stephen Shen Yu Juang pursuant to 19 U.S.C. § 1592.² Customs seeks civil penalties and recovery of unpaid duties accrued from 68 unlawful entries of track suits imported from the People's

¹ It has since become the Bureau of Customs and Border Protection per the Homeland Security Act of 2002, § 1502, Pub. L. No. 107-296, 116 Stat. 2135, 2308-09 (Nov. 25, 2002), and the Reorganization Plan Modification for the Department of Homeland Security, H.R. Doc. 108-32, p. 4 (Feb. 4, 2003).

² Juang was owner/president of Prime International Agency, Budget Transportation and controlled operations of Ever Power and Billion Sales. Juang does not move for summary judgment.

Republic of China ("PRC") into the United States. Customs alleges fraud, gross negligence, and negligence by the defendants. Tao, Pan Pacific, and Aviat Sportif (collectively "Defendants") move for summary judgment pursuant to USCIT R. 9(b), 11(b), and 56 and also seek USCIT R. 11 sanctions against plaintiff.

For the reasons set forth below, the Court denies Defendants' motion for summary judgment.

I. BACKGROUND

Tao was owner of Pan Pacific and Aviat Sportif. Customs alleges that between 1995 and 1997, Tao and Juang carried out a scheme by which track suits were illegally imported into the U.S. from the PRC. Juang willfully and deliberately mis-identified the tracksuits as plastic bags and other goods with 3% duty rates in order to avoid the 30% duty rate applied to track suits. Marcia A. Brown Declaration ("Brown Decl."), ¶¶5, 8. For Juang's services, Tao paid a flat rate, significantly lower than the actual duty amount. *Id.* at ¶11.

On or about November 26, 1996, Customs Special Agents began investigating Juang's alleged smuggling operation. *United States v. Thomas Tao*, Criminal Complaint, ¶5 (S.D. Ca. 1996) (Magistrate's Case No. 98-57/M) ("Criminal Comp."). On February 26, 1997, Customs searched the premises of a company owned by Juang and seized numerous records. *Id.* The seized documents revealed Tao's complicity in the operation from 1994 to 1997. Brown Decl. at ¶5. As a result of the seizure, Juang and Tao were criminally prosecuted for conspiring to smuggle merchandise into the United States; Tao was acquitted. *Id.* at ¶14.

Along with the documents removed during the February 26, 1997 raid, Customs also seized 4,189 cartons of merchandise. The confiscated track suits constituted part, but not all, of the 34 entries involved in Tao's criminal case. *Id.* at ¶15. After his acquittal, Tao filed a Motion for Return of Property, pursuant to FRCP R. 41(e). The dutiable value of the tracksuits was estimated to be \$244,404.81, and the duty owed was valued at \$62,717. After paying the outstanding duties, the merchandise was returned to Tao. *Id.* at ¶15.

On November 21, 2000, Customs filed the instant civil action pursuant to 19 U.S.C. § 1592. Customs seeks duties for the remaining 34 entries not already paid for, as well as for an additional 34 entries not involved in the criminal trial. Customs has valued the total domestic value of the merchandise at \$26,051,129, and the total duties owed at \$2,034,159.80. Plaintiff's Complaint, ¶¶29, 37 ("Pl.'s Comp.").³

Customs seeks \$26,051,129 in civil penalties for fraud. Alternatively, Customs seeks \$956,406 for gross negligence or \$482,703 for

³ The \$62,717 already paid by Tao is not part of this action. Plaintiff's Opposition to Defendant's Motion for Summary Judgment, 23 ("Pl.'s Opp.").

negligence. Pl.'s Comp. at ¶¶31, 35. Customs seeks \$2,034,159 or, alternatively, \$241,351, in recovery of lost duties and fees. Pl.'s Comp. at ¶¶38, 41.

II. STANDARD OF REVIEW

"Summary judgment is proper 'if the pleadings [together with the discovery materials] show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law.'" *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986) (quoting FRCP R. 56(c)). However, "if the evidence is such that a reasonable jury could return a verdict for the nonmoving party," summary judgment will not be granted. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986). All inferences will be drawn in favor of the party opposing the motion for summary judgment. *United States v. Neman*, 16 CIT 97, 784 F. Supp. 897 (1992).

III. DISCUSSION

In moving for summary judgment, Defendants make several claims. First, Defendants argue that Customs' complaint must be dismissed under USCIT R. 9(b) for failing to state the circumstances constituting fraud with particularity. Second, Defendants argue that Customs' claims are time barred by the applicable statute of limitations under 19 U.S.C. § 1621. Third, Defendants claim that since Tao has paid all outstanding duties to the government, Customs cannot seek recovery for lost duties. Fourth, Defendants seek summary judgment and sanctions against plaintiff due to alleged violations of USCIT R. 11. Each of these arguments is addressed in turn.

A. Customs' complaint is stated with sufficient particularity to satisfy the requirements of USCIT R. 9(b).

Defendants argue that Customs has failed to meet the standard set out by USCIT R. 9(b), requiring, "in all averments of fraud or mistake, the circumstances constituting fraud or mistake shall be stated with particularity." USCIT R. 9(b). Defendants contend that Customs' complaint lacks a factual basis as well as the requisite particularity. See Memorandum in Support of Defendants' Motion for Summary Judgment, 5 ("Defs.' Memo."). This argument is without merit.

The particularity required by Rule 9(b) does not mandate that a plaintiff put forth an exhaustive substantiation of the claims. *U.S. v. Scope Imports, Inc.*, 10 CIT 410 (1986). The rationale for the specificity requirement is to protect the defendant from undue surprise in ensuing proceedings. *United States v. Valley Steel Products Co.*, 12 CIT 1161, 1163 (1988). Therefore, "[i]f a complaint identifies the circumstances constituting the fraud so that the defendant can respond to the allegations, Rule 9(b) has been satisfied." *United States v.*

Priscilla Modes, Inc., 9 CIT 589, 599 (1985). In *Priscilla*, the court identified three criteria that satisfied the Rule 9(b) particularity requirement for a complaint under 19 U.S.C. § 1592: (1) asserting that defendant's behavior was fraudulent; (2) listing the documents relied upon to establish fraud; and (3) claiming an injury to plaintiff as a result of defendant's conduct. *Id.*

In the instant action, Customs' complaint satisfies the Rule 9(b) requirement set forth in *Priscilla*. First, Customs clearly asserted that Defendants' behavior was fraudulent, alleging "[t]he material false statements *** were committed, or caused by defendants Tao and Juang and their companies knowingly, voluntarily, and intentionally and thus were fraudulent violations of 19 U.S.C. § 1592(a)." Pl.'s Comp. at ¶27. Second, Customs identifies the 68 entries that substantiate the fraud. *Id.* at ¶16. Third, Customs adequately identifies the injury caused by the fraud, stating, "as a result of the violations *** the United States was deprived of lawful customs duties in the amount of \$2,034,159.80." Pl.'s Comp. at ¶22. Therefore, Customs has clearly met the standard for a complaint under 19 U.S.C. § 1592, and, accordingly, the Court denies summary judgment for failure to satisfy USCIT R. 9(b).

B. Issues of material fact exist as to when Customs discovered the alleged violations.

The central issue for Defendants' second argument is whether the applicable statute of limitations in 19 U.S.C. § 1621 bars Customs' suit.⁴ According to the statutory scheme set forth by § 1621, a plaintiff must institute a claim pursuant to 19 U.S.C. § 1592 within five years of the offense. For cases of fraud, however, the statute follows a discovery rule: a plaintiff need only institute a claim of fraud within five years of discovery of the violation. Defendants argue that Customs' fraud claims are time barred, because the government was aware of possible § 1592(a) violations more than five years before filing the complaint. In addition, Defendants argue that Customs' gross negligence and negligence claims should not apply to transactions that took place more than five years before the complaint was filed.

⁴Section 1621 states:

No suit or action to recover any duty under section 1592(d), 1593a(d) of this title, or any pecuniary penalty or forfeiture of property accruing under the customs laws shall be instituted unless such suit or action is commenced within five years after the time when the alleged offense was discovered, or in the case of forfeiture, within 2 years after the time when the involvement of the property in the alleged offense was discovered, whichever was later; except that—

(1) in the case of an alleged violation of section 1592 or 1593a of this title, no suit or action (including a suit or action for restoration of lawful duties under subsection (d) of such sections) may be instituted unless commenced within 5 years after the date of the alleged violation or, if such violation arises out of fraud, within 5 years after the date of discovery of fraud, and

(2) the time of the absence from the United States of the person subject to the penalty or forfeiture, or of any concealment or absence of the property, shall not be reckoned within the 5-year period of limitation.

19 U.S.C. § 1621 (2003).

With respect to Defendants' first contention, the issue in dispute is when Customs discovered the alleged offense. Defendants allege that Customs knew of the Tao-Juang scheme before November 21, 1996. Defs.' Memo. at 12. As such, Customs' entire action for fraud should be barred. Customs argues that the discovery date for the transactions in question was February 26, 1997, thus rendering Defendants' statute of limitations argument moot.

Defendants' argument of Customs' early knowledge of a Tao-Juang scheme derives from the criminal complaint in the aforementioned criminal prosecution, *United States v. Thomas Tao*. In the criminal complaint, Special Agent David Peters stated, "Beginning on or about November 26, 1996 *** I assisted SSA Henry Griffin *** [with] his investigation of Stephen Juang." Criminal Comp. at ¶5. Customs argues that November 26, 1996 simply marked the beginning of an investigation of Juang. Pl.'s Opp. at 19. Customs claims only to have discovered information that suggested a link between Tao and Juang on February 26, 1997, when its monitoring of Juang's activities resulted in a raid of one of Juang's companies. *Id.* According to Customs, only with those documents seized on February 26, 1997 did the Tao-Juang scheme become apparent. Brown Decl. at ¶9.

It is not necessary to resolve this issue on the merits at this juncture. Customs presents a line of reasoning with some degree of factual support. The question of when Customs actually discovered the violation is an issue of material fact. Therefore, summary judgment for Tao is not warranted.

With respect to Defendants' second contention, there is no meritorious argument. Defendants argue that Customs' claims of gross negligence and negligence should not apply to transactions that occurred prior to November 21, 1996. Defs.' Memo. at 8. In Counts II and III, Customs does not seek damages for any transactions that took place before that date. Therefore, Defendants' contention is irrelevant to Customs' complaint, and the Court denies summary judgment on the issue of Customs' failure to satisfy 19 U.S.C. § 1621.

C. Tao's payment for return of merchandise pursuant to FRCP R. 41(e) does not warrant summary judgment.

Tao paid \$62,717 to secure the return of merchandise seized in the February 26, 1997 raid. Defendants argue that the \$62,717, plus Juang's payment of a \$1.4 million criminal fine, reimburses Customs for any revenue deprived, thus warranting dismissal on summary judgment. Defs.' Memo. at 9. Defendants further argue that Customs unreasonably inflated the amount of duties owed. Therefore, in addition to dismissal, Defendants also claim to be entitled to a partial refund of the \$62,717 already paid. None of these allegations warrant summary judgment.

Defendants' argument is incompatible with Customs' claim because it does not directly challenge Customs' allegations. While Defendants argue that they should not stand trial for entries lawfully made, Customs instead seeks recovery of entries that remain unpaid. Customs contends that the seized garments constitute only a very small portion of the total merchandise at issue in this case. Customs further asserts that they subtracted the \$62,717 from their calculations for actual loss of revenue. Pl.'s Opp. at 23-24. These issues remain to be litigated at trial. Accordingly, the Court denies summary judgment on the basis of this claim.

D. The alleged Rule 11 violations do not warrant summary judgment nor sanctions.

Defendants seek summary judgment and sanctions for alleged violations of USCIT R. 11(b)(1), 11(b)(3) and 11(b)(4).⁵ First, they argue that the government does not have sufficient evidence that Tao was engaged in Juang's illegal scheme, and therefore Customs' suit constitutes harassment. Second, they argue that Customs' claim that the merchandise is worth over \$26 million is "reckless inflation" aimed at recovering higher duties under the lower standard of proof in civil actions. Defs.' Memo. at 12. Upon examination, neither of these contentions is a tenable basis for either Rule 11 sanctions or summary judgment.

Defendants' first claim, of harassment by Customs, is unsupported. Customs has put forth sufficient evidence regarding the Tao-Juang scheme to sufficiently convince the Court at this juncture that its case is aimed at recovering outstanding duties and not simply to harass Tao. If shown to be true, the dates, extent, and manner of Tao's involvement in the Tao-Juang scheme is evident in the papers submitted to the Court. *See Brown Decl.* Moreover, the prior criminal trial does not preclude the instant civil suit because of the disparate burden of proof applied to civil suits as opposed to criminal trials. *See One Lot Emerald Cut Stones and One Ring v. United States*, 409 U.S. 232, 235 (1972).

Defendants' second claim, regarding the amount sought by Customs, is a factual issue. Customs asserts that \$26,051,129 represents the total domestic value of the merchandise involved in the suit. Pl.'s

⁵ Rule 11(b) states:

By presenting to the court (whether by signing, filing, submitting, or later advocating) a pleading, written motion, or other paper, an attorney or unrepresented party is certifying that to the best of the person's knowledge, information, and belief, formed after any inquiry reasonable under the circumstances,—

(1) it is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;

(2) the allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and

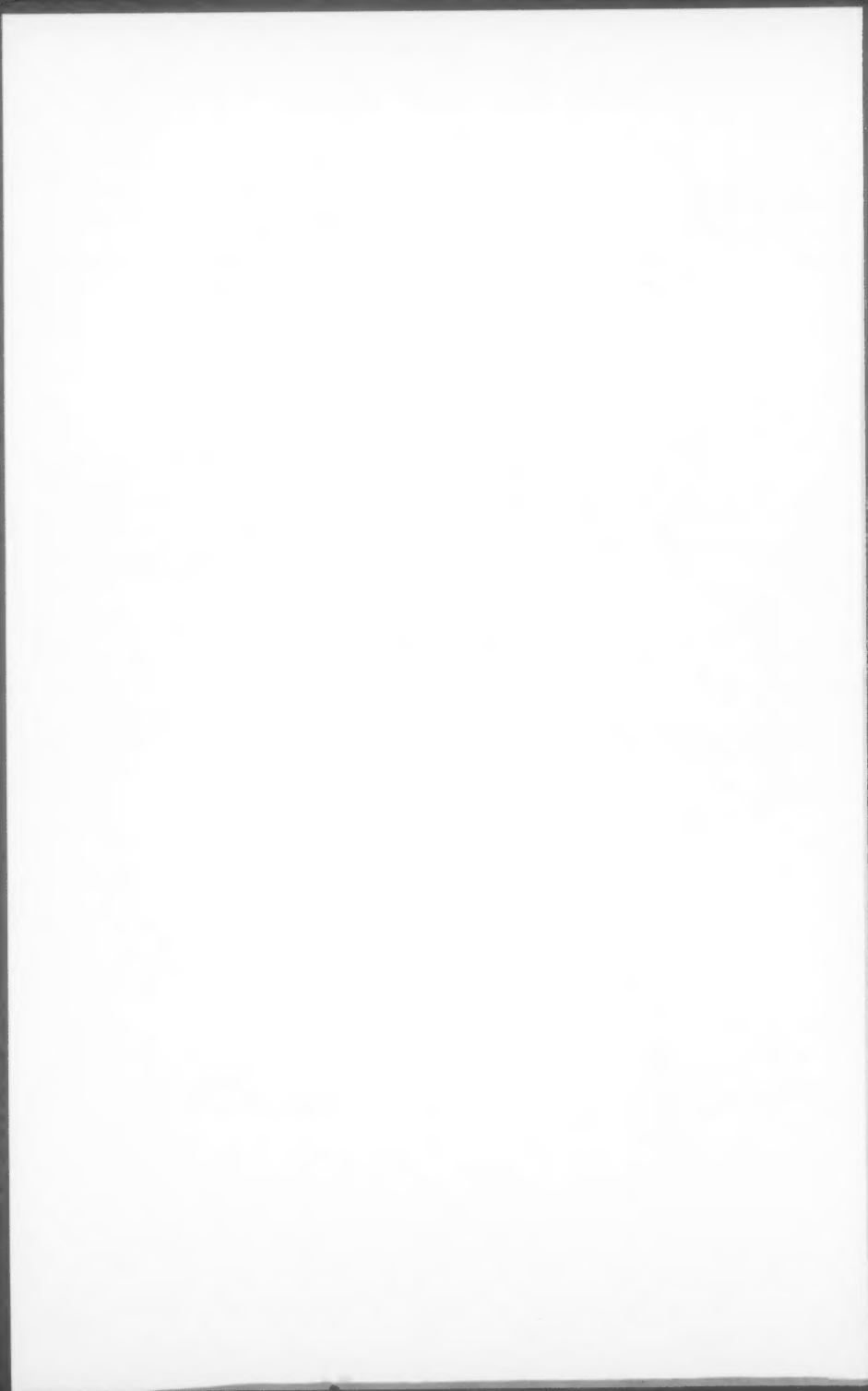
(3) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on a lack of information or belief * * *

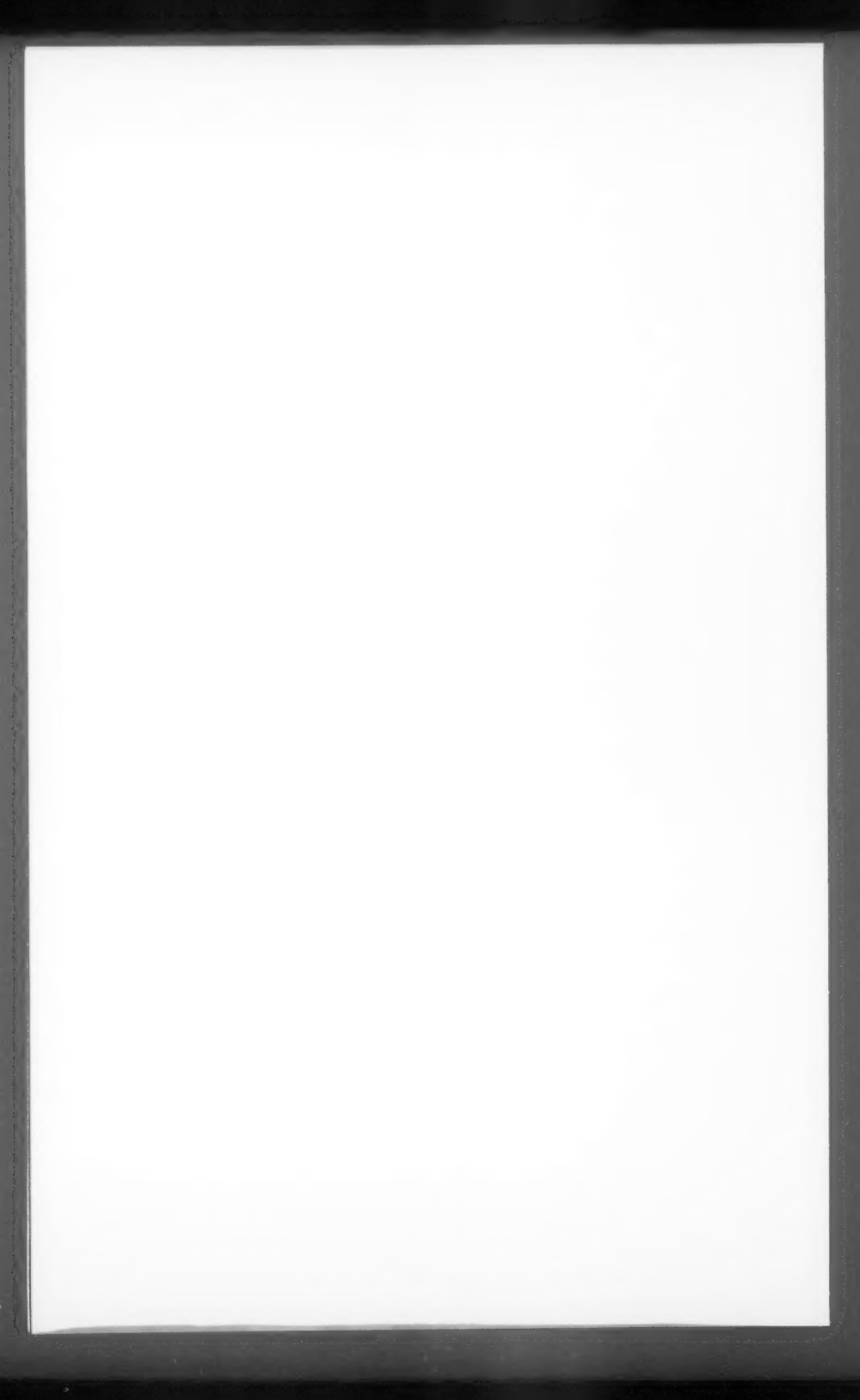
USCIT R. 11(b).

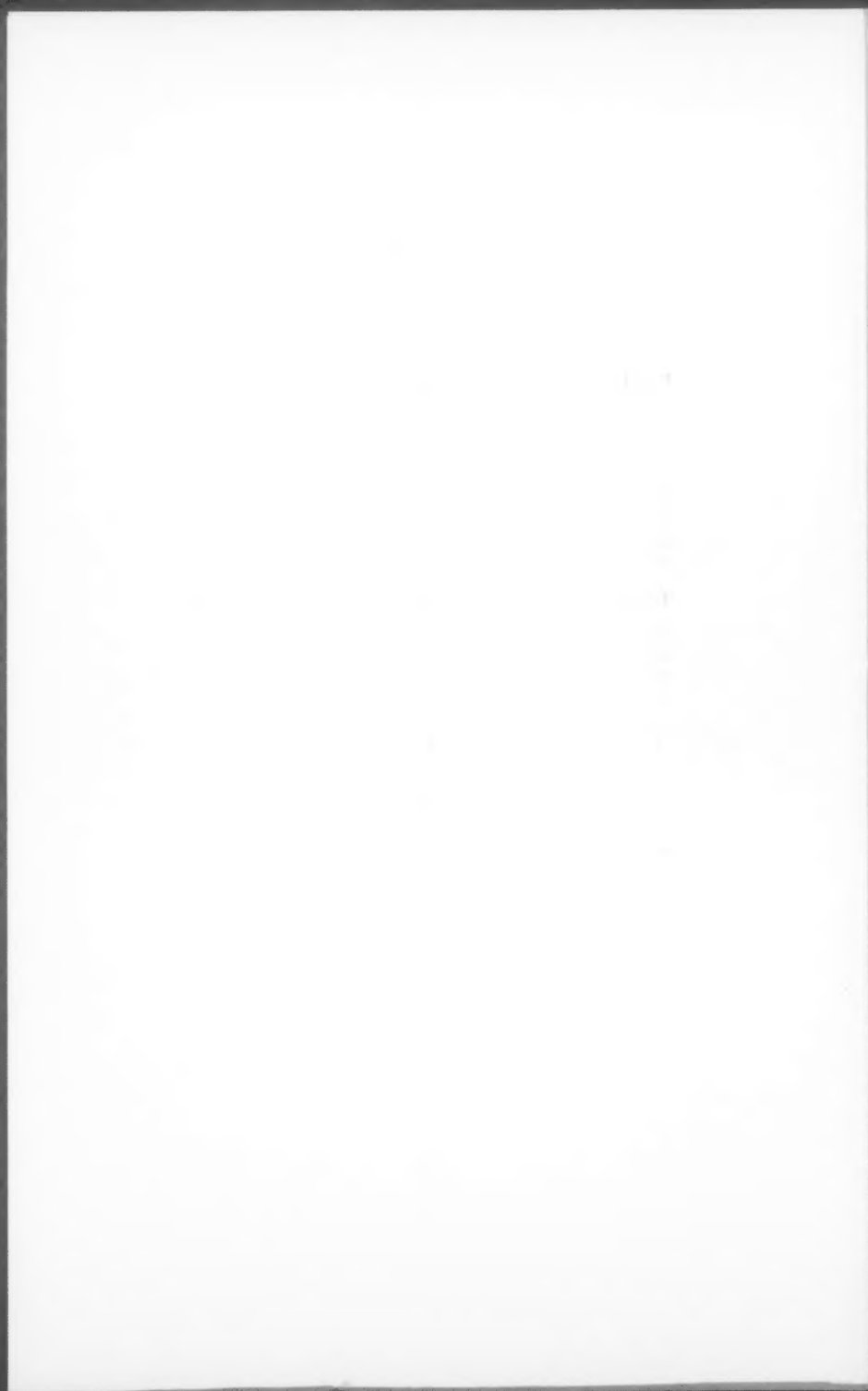
Comp. at ¶28; *see also* Letter from Robert Thierry to Victor Sherman, Nov. 12, 2000. Defendants may challenge Customs' calculations. This, however, is an issue to be taken up at trial. The numbers put forth are not frivolous enough to warrant Rule 11 sanctions nor summary judgment. Accordingly, the Court denies Defendants' motion for summary judgment on the basis of Rule 11 violations.

IV. CONCLUSION

As discussed above, Defendants do not offer sufficiently compelling arguments for summary judgment: (1) Customs' complaint meets the standards set out by USCIT R. 9(b); (2) there exist issues of material fact as to whether Customs discovery of Tao's involvement falls within with the applicable statute of limitations in 19 U.S.C. § 1621; (3) Defendant's claim that they have already reimbursed the Customs for lost revenues does not directly challenge Customs' allegations; and (4) Defendants have not provided sufficient evidence of Rule 11 violations by plaintiff. Accordingly, for the aforementioned reasons, Defendants' motion for summary judgment is denied.







Index

Customs Bulletin and Decisions
Vol. 37, No. 30, July 23, 2003

Bureau of Customs and Border Protection

General Notices

	Page
General Notice	
CBP Decision 03-06.....	82
CBP Decision 03-07.....	83
Distribution of continued dumping and subsidy offset to affected domestic producers.....	1

CUSTOMS RULINGS LETTERS AND TREATMENT

Tariff classification:	
Proposed modification and revocation	
Digital cameras.....	90
Met-Plus, a rumen protected methionine additive	84

U.S. Court of International Trade

Slip Opinions

	Slip Op. No.	Page
United States v. Pan Pacific Textile Group, Inc.	03-78	113

